

FILED**UNITED STATES DISTRICT COURT**

DEC 11 2006

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT**

v.

ADRIAN FLORIN FECHETE,
 RAIMONDORAY CERNA,
 AIDA SALEM,
 GABRIEL CONSTANTIN,
 ADRIAN IANC,
 MIHAI BLEDEA,
 GARY MICHAEL SCHNEIDER,
 JESSIE VEGA,
 MIHAIL EUGEN HANN,
 IGOR ASLAN,
 IOAN MOLOMAN,

BOGDAN GANESCU,
 MARIAN ALEXANDRU,
 RADU RIZESCU,
 GIANINA SIMON,
 CRISTIAN BENTAN,
 CONSTANTIN REMUS LUCAN,
 STEFAN LAURENTIU DUMITRU,
 MUSZKA LADISLAU,
 MIHAI PANAITESCU,
 and LUCIAN NANAU

06CR0923**MAGISTRATE JUDGE VALDEZ**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between on or about November 2003 and August 2006 in Cook county, and elsewhere, in the Northern District of Illinois defendant(s) did,

(Track Statutory Language of Offense)

having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmit or cause to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, as more specifically described in Counts One through Twenty-One on Attachment A,

in violation of Title 18 United States Code, Section(s) 1343 and 2

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:

Official Title

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me and subscribed in my presence,

Signature of Complainant

December 11, 2006

Date

at Chicago, Illinois

City and State

MARIA VALDEZ, U.S. Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT A - Western Union Wire Transfers Executing the Scheme

Ct.	Defendant	Transfer amount	Date	To Illinois from ...
1	Fechete	\$ 5,000.00	02/12/05	Prairieville, LA
2	Cerna	\$ 5,100.01	03/31/05	Grand Rapids, MI
3	Salem	\$ 2,085.00	03/09/05	McKeesport, PA
4	Bledea	\$ 3,100.00	02/21/05	Oconomowoc, WI
5	Constantin	\$ 1,000.00	07/05/05	Appleton, WI
6	Ianc	\$ 3,908.00	04/02/05	Stockton, CA
7	Schneider	\$ 4,500.00	09/14/05	Long Beach, CA
8	Vega	\$ 4,000.00	06/24/05	Ft. Lauderdale, FL
9	Moloman	\$ 3,500.00	04/01/05	Galloway, NJ
10	Aslan	\$ 2,500.00	04/07/05	Vernal, UT
11	Hann	\$ 3,420.00	06/29/05	Washington, MO
12	Alexandru	\$ 800.00	03/10/04	Bridgeton, MO
13	Ganescu	\$ 1,650.00	10/04/04	Santa Clara, CA
14	Simon	\$ 1,504.00	08/08/05	Madison, AL
15	Rizescu	\$ 2,000.00	04/08/04	Albuquerque, NM
16	Ladislau	\$ 1,940.00	08/12/05	Springfield, MO
17	Bentan	\$ 2,950.00	10/01/05	Richmond, VA
18	Lucan	\$ 2,930.00	02/21/05	Marysville, OH
19	Panaiteescu	\$ 2,601.00	04/06/05	Foreman, AR
20	Dumitru	\$ 5,568.00	04/08/05	Wareham, MA
21	Nanau	\$ 1,450.00	08/06/05	Santa Barbara, CA

I, Michael Blessing, first being duly sworn, state the following under oath:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) within the Chicago Field Office. I have held that position for approximately 7 years and during that time have been assigned primarily to investigations involving traditional and internet-based fraud. Additionally, I have been working during this investigation with other law enforcement agents who have numerous years of experience investigating fraud.

2. The following statements are based on my personal knowledge, conversations with other law enforcement officers and witnesses, as well as records obtained by law enforcement from various sources such as Western Union and currency exchanges in the Chicago area. This affidavit does not contain all of the information known to law enforcement regarding this investigation, but rather contains only those facts that I believe to be necessary to establish probable cause.

I. Overview

3. The government seeks this criminal complaint in order to charge the 21 individuals (the "Subjects") listed in ¶ 4 who are believed to have obtained money through an internet-based fraud scheme with origins in the country of Romania. At this time, I believe that more than 2,000 individuals in the United States and abroad have fallen victim to the scheme and suffered losses totaling in excess of \$5,000,000 between approximately November 2003 and August 2006.

4. More specifically, the information in this Affidavit is provided to establish probable cause to show that the Subjects knowingly and intentionally devised,

participated in, and executed a wire fraud scheme, in violation of Title 18, United States Code, Section 1343:

ADRIAN FLORIN FECHETE,
also known as "Ade,"
RAIMONDORAY CERNA,
also known as "Raimondo,"
AIDA SALEM,
ADRIAN IANC,
GABRIEL CONSTANTIN,
also known as "Armand,"
MIHAI BLEDEA,
GARY MICHAEL SCHNEIDER,
JESSIE VEGA,
IOAN MOLOMAN,
IGOR ASLAN,
MIHAIL EUGEN HANN,
also known as "Copilu,"
MARIAN ALEXANDRU,
also known as "Panther,"
BOGDAN GANESCU,
also known as "Boogy,"
GIANINA SIMON,
RADU RIZESCU,
MUSZKA LADISLAU,
CRISTIAN BENTAN,
CONSTANTIN REMUS LUCAN,
also known as "Dorel,"
MIHAI PANAITESCU,
also known as "Cactus,"
STEFAN LAURENTIU DUMITRU,
also known as "Tica," and
LUCIAN NANAU

II. General description of the fraud scheme

5. The FBI, Bureau of Immigration and Customs Enforcement (ICE), and Chicago Police Department (CPD) have been investigating a large volume of complaints pertaining to this internet-based fraud scheme. In summary, the

victims of the scheme were led to believe that they were purchasing items that had been listed for sale on the internet, typically via eBay. The victims were instructed over the internet to send the purchase money via Western Union to be picked up by the seller or the seller's agent, generally in the vicinity of Chicago, Illinois. After sending the money, the victims did not receive the goods the seller had agreed to provide.

6. Law enforcement has received information from a number of reliable sources which provides reason to believe that the fraudulent internet solicitations originated from, and that a substantial portion of the proceeds resulting from the scheme have been transmitted to, individuals located outside of the United States, most likely Romania (the "Foreign Co-Schemers").

7. The Subjects of this Affidavit are individuals who have knowingly participated in the fraud scheme in the United States, generally in the vicinity of Chicago, by (i) obtaining multiple alias identification documents to use when receiving fraud proceeds from Western Union or recruiting other individuals to receive fraud proceeds from Western Union, (ii) causing the alias names and the names of individuals recruited to receive proceeds to be communicated abroad to the Foreign Co-Schemers, (iii) receiving, or directing others to receive, fraud proceeds from Western Union agents, typically currency exchanges, in the vicinity of Chicago, and (iv) transmitting, or causing to be transmitted, a portion of the fraud proceeds to the Foreign Co-Schemers.

III. Summary of the evidence

8. Evidence derived from a number of sources leads me to believe that the Subjects of this Affidavit are jointly participating in a coordinated scheme to defraud. This evidence includes the following: (i) information obtained from prior interviews and arrests of some of the Subjects of this investigation, (ii) analysis of records maintained by Western Union and currency exchanges pertaining to the transmission of fraud proceeds to the Subjects, (iii) review of the fraudulent internet solicitations and other on-line communications which led the victims to transmit their funds via Western Union to the Subjects, and (iv) analysis of seized telephones and records obtained from telephone service providers.

A. Interviews and arrests of subjects of the investigation

9. Two of the Subjects of this Affidavit have made post-*Miranda* statements to law enforcement in which both stated that individuals in Romania were committing fraud over the internet and were directing the victims to send funds via Western Union to aliases obtained by the Subjects and that, after keeping a portion of the fraud proceeds for themselves, the balance of the fraud proceeds were transmitted in various ways to those running the scheme. This information has been corroborated by another Subject of this Affidavit who has been debriefed by the government and acted at times as a cooperating witness during the investigation.

B. Analysis of records maintained by Western Union and currency exchanges

10. Thus far, law enforcement has reviewed information from Western Union and currency exchanges pertaining to more than 2,000 Western Union wire transfers believed to be related to the scheme to defraud. When processing the wire transfers of funds, Western Union and the currency exchanges collected a variety of data from the individuals who received the wire transferred funds.

11. For example, Western Union generally required individuals presenting themselves as the intended payee of a wire transfer to present one or more valid identification documents in order to establish their identity. It was the general practice of Western Union agents to memorialize in their records the document type and document number presented by the receiver of the funds.

12. Additionally, Western Union agents (generally currency exchanges in the context of this investigation) frequently made a photocopy of the identification documents presented by individuals who presented themselves as the authorized payee of high-dollar wire transfers of funds. By gathering and reviewing these photocopied identification documents (as well as identification documents seized by various law enforcement agencies at various times), I have been able to identify dozens of aliases that I believe were employed by the Subjects while participating in the scheme to defraud.

13. In addition, at the time that the Subjects received wire transfers of funds, the paying agents requested that the payee complete an application in which he or she provided a variety of personal identifying information, such as name, address, and telephone number. In addition to being retained by Western Union

agents in physical form on the application for receipt of the funds filled out by the payee, this identifying information was also collected and maintained by Western Union in an electronic database. By reviewing this information, I have identified numerous instances in which two or more of the Subjects provided to Western Union common addresses and telephone numbers. In addition, I have identified from these transactional records numerous instances in which the Subjects picked up fraud proceeds at the same currency exchange on the same day.

C. Review of internet communications relating to the fraud scheme

14. The victims of this scheme sent money via Western Union to the Subjects of this Affidavit after communicating on-line with someone who claimed that he or she was going to sell them an item that had previously been advertised for sale on the internet, generally on eBay. The funds were transmitted by the victims to the Subjects (or individuals recruited by the Subjects) after being identified to the victims on-line as, for example, the "seller," the "seller's agent," or an "eBay agent." Thus far, law enforcement has received information from more than 500 victims of this scheme. In many instances, the victims provided to law enforcement copies of the fraudulent internet solicitations and other on-line communications with the "sellers." Analysis of this material has revealed that the fraudulent internet solicitations very often shared identical features, such as bogus eBay logos and other graphics, and false assurances that buyers would be protected by insurance and escrow of funds.

D. Review of telephone records and seized telephones

15. The government has seized telephones from a number of the Subjects, and has obtained telephone records through the issuance of grand jury subpoenas. Review of the seized telephones and telephone records demonstrates that the Subjects have been communicating with one another while the scheme was on-going.

IV. Summary of information regarding the Subjects of this Affidavit

16. The following section is a summary of information presented in this Affidavit relating to the Subjects.

17. **ADRIAN FLORIN FECHETE** - FECHETE has personally received (using approximately 6 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between November 2004 and March 2005 totaling approximately \$170,000. In addition, FECHETE recruited **GARY MICHAEL SCHNEIDER** and **JESSIE VEGA** to participate in the scheme. **SCHNEIDER** and **VEGA**, at the behest of FECHETE, recruited additional individuals who picked up fraud proceeds transmitted by victims via Western Union to currency exchanges in the Chicago area between approximately June 2005 and September 2005 in amounts totaling approximately \$689,000. When collecting fraud proceeds, FECHETE has at times provided to Western Union the same addresses as **MARIAN ALEXANDRU** and **IOAN MOLOMAN**, and has provided the same telephone numbers as **AIDA SALEM** and **GABRIEL CONSTANTIN**. At times, FECHETE has collected fraud proceeds at the

same currency exchange on the same date as SALEM, MOLOMAN, CONSTANTIN REMUS LUCAN, and STEPHAN LAURENTIU DUMITRU. At various times between mid-February 2005 and mid-March 2005, FECHETE, as well as CONSTANTIN, DUMITRU, LUCAN, and MOLOMAN, used false identification documents that purported to have been issued by the State of Vermont when receiving Western Union wire transfers in alias names. The residence of FECHETE was searched by Federal law enforcement agents in March 2006, at which time numerous alias identification documents were recovered. As a result, FECHETE was charged in this district in March 2006 with possessing false identification documents with the intent to defraud, passport fraud, and aggravated identity theft. FECHETE is currently in the custody of the United States Marshals Service (USMS). A cellular telephone recovered by law enforcement at the time of FECHETE's arrest contained telephone numbers for SCHNEIDER and VEGA. Law enforcement has obtained records from U.S. Cellular for another telephone number subscribed to in the name of an alias used by FECHETE, and the calling activity records indicate that FECHETE's cellular telephone number was used to call numbers associated with CONSTANTIN, GANESCU, MOLOMAN, and PANAITESCU in February and March 2005.

18. GARY MICHAEL SCHNEIDER - SCHNEIDER was recruited by FECHETE to pick-up funds transmitted via Western Union to currency exchanges in the vicinity of Chicago and other places, and to transmit proceeds to Romania. At the behest of FECHETE, SCHNEIDER recruited additional friends and

acquaintances to pick up funds in their true names at currency exchanges, using information provided by FECHETE to receive the funds, and to transmit funds to Romania. SCHNEIDER and other individuals that he recruited into the scheme at the behest of FECHETE have received fraud proceeds transmitted via Western Union in amounts totaling approximately \$356,000. SCHNEIDER has covertly cooperated with the government in the investigation hoping to receive consideration for his cooperation when he is sentenced in this case.

19. **JESSIE VEGA** - VEGA was recruited by FECHETE to pick-up fraud proceeds transmitted via Western Union to currency exchanges in the Chicago area. VEGA did so by recruiting at least 9 other individuals who picked up funds in their true names at currency exchanges in the Chicago area. Records obtained from currency exchanges and Western Union indicate that in the summer of 2005, these 9 individuals received wire transfers of funds totaling approximately \$332,000. VEGA told some of the recruited individuals that he was in the car sales business and that the funds were being transmitted to purchase vehicles that VEGA had sold. VEGA in some instances paid the recruits a nominal amount of money for making the money pick-ups. A telephone number associated with VEGA was found in the directory of a cellular telephone seized from FECHETE, and FECHETE has called VEGA from the Chicago Metropolitan Correctional Center (MCC). In a case unrelated to the instant investigation, VEGA has recently been charged in Cook County with a number of crimes, including commission of a felony while armed, aggravated unlawful possession of a weapon, and felony possession of a controlled

substance.

20. **RAIMONDORAY CERNA** - CERNA was recently sentenced to 28 months imprisonment after pleading guilty to having unlawfully reentered the United States, and is currently in the custody of the Bureau of Prisons (BOP). CERNA reentered the U.S. after his prior deportation by using a false U.S. passport. Since reentering the United States, CERNA has been arrested at least twice while in possession of false identification documents, and while in the company of, among others, AIDA SALEM and MARIAN ALEXANDRU. CERNA has received (using approximately 18 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between November 2003 and April 2005 totaling approximately \$407,000. When collecting fraud proceeds, CERNA at times provided to Western Union the same addresses as CONSTANTIN, MOLOMAN, and ALEXANDRU, and has provided the same telephone numbers as SALEM, CONSTANTIN, and MOLOMAN. At times, CERNA has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN and ALEXANDRU. At various times during December 2003, CERNA and ALEXANDRU both used false identification documents that purported to have been issued by the State of Tennessee when receiving Western Union wire transfers in alias names. At various times during January and February 2004, CERNA and CONSTANTIN both used false identification documents that purported to have been issued by the State of Ohio when receiving Western Union wire transfers in alias names. At various times

during late March 2004 through late April 2004, CERNA, as well as CONSTANTIN, ADRIAN IANC, MUSZKA LADISLAU, RADU RIZESCU, and SALEM, used false identification documents that purported to have been issued by the State of Nevada when receiving Western Union wire transfers in alias names. A telephone seized when CERNA was arrested was searched by law enforcement and found to contain text messages with information that would enable CERNA to obtain a Western Union wire transfer of funds, such as name of sender, address, dollar amount, and the unique money transfer control number (MTCN) assigned by Western Union to wire transfers of funds. Call records relating to that cellular telephone indicate that CERNA had been in contact with telephone numbers associated with FECHETE, MOLOMAN, PANAITESCU, and VEGA.

21. **AIDA SALEM** - SALEM has received (using approximately 18 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between March 2004 and January 2006 totaling approximately \$321,000. SALEM has been arrested at least twice while in possession of false identification documents, once while in the company of CERNA. When collecting fraud proceeds, SALEM has at times provided to Western Union the same addresses as CONSTANTIN, and IANC, and has provided the same telephone numbers as CERNA, CONSTANTIN, FECHETE, and MOLOMAN. At times, SALEM has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, FECHETE, IANC, MOLOMAN, and PANAITESCU. At various times during late March 2004 through late April 2004, SALEM, as well

as CERNA, CONSTANTIN, IANC, LADISLAU, and RIZESCU, used false identification documents that purported to have been issued by the State of Nevada when receiving Western Union wire transfers in alias names.

22. **GABRIEL CONSTANTIN** - CONSTANTIN has received (using approximately 11 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between January 2004 and October 2005 in amounts totaling approximately \$297,000. When collecting fraud proceeds, CONSTANTIN has at times provided to Western Union the same addresses as ASLAN, CERNA, and SALEM, and has provided the same telephone numbers as ASLAN, CERNA, FECHETE, and SALEM. At times, CONSTANTIN has collected fraud proceeds at the same currency exchange on the same date as ASLAN, CERNA, DUMITRU, HANN, IANC, MOLOMAN, PANAITESCU, and SALEM. At various times during January and February 2004, CONSTANTIN and CERNA used false identification documents that purported to have been issued by the State of Ohio when receiving Western Union wire transfers in alias names. At various times during late March 2004 through late April 2004, CONSTANTIN, as well as CERNA, IANC, LADISLAU, SALEM, and RIZESCU, used false identification documents that purported to have been issued by the State of Nevada when receiving Western Union wire transfers in alias names. Also, at various times between mid-February 2005 and mid-March 2005, CONSTANTIN, as well as DUMITRU, FECHETE, LUCAN, and MOLOMAN, used false identification documents that purported to have been issued by the State of Vermont when

receiving Western Union wire transfers in alias names. Western Union checks issued to pay out wire transfers of fraud proceeds picked up by CONSTANTIN under two different aliases have been deposited into a bank account maintained by IOAN MOLOMAN. When BLEDEA was arrested by the Hillside Police Department in August 2006, BLEDEA was found to be in possession of one of CONSTANTIN's business cards, which listed CONSTANTIN's cellular telephone number as (773) 216-1564. Records of telephone activity indicate that CONSTANTIN's telephone number has been in contact with telephones associated with FECHETE and RIZESCU.

23. **ADRIAN IANC** - IANC has received (using approximately 14 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between April 2004 and February 2006 in amounts totaling approximately \$296,000. When collecting fraud proceeds, IANC has at times provided to Western Union the same addresses as SALEM. At times, IANC has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, PANAITESCU, and SALEM. At various times during late March 2004 through late April 2004, IANC, as well as CERNA, CONSTANTIN, LADISLAU, SALEM, and RIZESCU, used false identification documents that purported to have been issued by the State of Nevada when receiving Western Union wire transfers in alias names. At various times during April 2005, IANC, as well as BOGDAN GANESCU, LADISLAU and GIANINA SIMON, used false identification documents that purported to have been issued by the State of

Connecticut when receiving Western Union wire transfers in alias names.

24. **MIHAI BLEDEA** - BLEDEA has received (using approximately 17 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between December 2004 and July 2006 totaling approximately \$273,000. At various times in May 2005, ASLAN and BLEDEA both used false identification documents that purported to have been issued by the State of Wisconsin when receiving Western Union wire transfers in alias names. BLEDEA has been arrested on at least two occasions in possession of false identification documents while attempting to receive Western Union wire transfers. BLEDEA's cellular telephone was searched in August 2006 subsequent to his most recent known arrest, and it was found to contain text messages that provided information (sender name, location, amount, MTCN) that could be used to collect Western Union wire transfers.

25. **MIHAIL EUGEN HANN** - HANN has received (using his true name and approximately 4 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between May 2005 and November 2005 in amounts totaling approximately \$184,000. At times, HANN has collected fraud proceeds at the same currency exchange on the same date as ALEXANDRU, ASLAN, and CONSTANTIN.

26. **IOAN MOLOMAN** - MOLOMAN has received (using approximately 9 aliases and his true name) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between

November 2004 and May 2005 in amounts totaling approximately \$163,000. When collecting fraud proceeds, MOLOMAN has at times provided to Western Union the same addresses as CERNA, FECHETE, and LUCAN, and has provided the same telephone numbers as CERNA, LUCAN, and SALEM. At times, MOLOMAN has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, DUMITRU, FECHETE, LUCAN, and PANAITESCU. At various times during February 2004, MOLOMAN, as well as CONSTANTIN and LUCAN, used false identification documents that purported to have been issued by the State of Vermont when receiving Western Union wire transfers in alias names. Also, at various times between mid-February 2005 and mid-March 2005, MOLOMAN, as well as CONSTANTIN, DUMITRU, FECHETE, and LUCAN, used false identification documents that purported to have been issued by the State of Vermont when receiving Western Union wire transfers in alias names. At various times during April 2005, MOLOMAN, as well as PANAITESCU and DUMITRU, used false identification documents that purported to have been issued by the State of Michigan when receiving Western Union wire transfers in alias names. Western Union checks issued to pay out wire transfers of fraud proceeds sent to aliases used by CONSTANTIN (two aliases) DUMITRU (two aliases), LUCAN, and SALEM have been deposited into bank accounts maintained in the name of MOLOMAN. Records obtained from Charter One Bank indicate that MOLOMAN's telephone number was (773) 209-1482. Records of telephone activity indicate that MOLOMAN's telephone number has been in contact with telephone numbers

associated with CERNA and FECHETE. MOLOMAN and PANAITESCU were charged as co-conspirators in another prosecution in this district (case no. 05 CR 553) relating to an ATM skim committed in the summer of 2005, and both have pleaded guilty in that case to conspiracy to commit access device fraud. MOLOMAN is currently in the custody of the USMS.

27. **IGOR ASLAN** - ASLAN has received (using approximately 9 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between March 2005 and June 2005 totaling approximately \$167,000. When collecting fraud proceeds, ASLAN has at times provided to Western Union the same address and telephone number as CONSTANTIN. At times, ASLAN has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, HANN, and SIMON. At various times in May 2005, ASLAN and BLEDEA both used false identification documents that purported to have been issued by the State of Wisconsin when receiving Western Union wire transfers in alias names. In June 2005, one victim of the scheme, after initially being instructed to wire transfer funds to an alias used by ASLAN, was later instructed to change the receiver to an alias used by CONSTANTIN.

28. **BOGDAN GANESCU** - GANESCU has received (using approximately 6 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between October 2004 and June 2005 in amounts totaling approximately \$98,000. At various times in April

2005, GANESCU, as well as IANC, LADISLAU, and SIMON, used false identification documents that purported to have been issued by the State of Connecticut when receiving Western Union wire transfers in alias names. Telephone records show that a telephone number subscribed to by RADU RIZESCU was in contact with a U.S. Cellular telephone number subscribed to by GANESCU on the day after RIZESCU was arrested by the Arlington Heights Police Department in July 2004. Telephone records also show that a telephone number subscribed to by "Florin Ghioc," an alias used by FECHETE, was in contact in February and March 2005 with a telephone number subscribed to by GANESCU. The same U.S. cellular telephone number subscribed to by GANESCU was located in the directory of a cellular telephone belonging to BLEDEA, which was searched by law enforcement after BLEDEA's arrest in August 2006. Law enforcement has learned from various sources that GANESCU is married to GIANINA SIMON.

29. **MARIAN ALEXANDRU - ALEXANDRU** has received (using approximately 5 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area and in Florida at various times between December 2003 and August 2005 in amounts totaling approximately \$94,000. ALEXANDRU was arrested in September 2005 in Florida on the same day at the same apartment complex as RAIMONDORAY CERNA, and at the time of their arrest, law enforcement agents recovered alias identification documents depicting both CERNA and ALEXANDRU. After his arrest, ALEXANDRU was charged in the Southern District of Florida with having unlawfully entered the

United States subsequent to deportation. ALEXANDRU, who is in the custody of the USMS in the Southern District of Florida, has pleaded guilty to that offense and is scheduled to be sentenced in January 2007. When collecting fraud proceeds, ALEXANDRU has at times provided to Western Union the same addresses as CERNA, FECHETE, and NANAU, and has provided the same telephone number as NANAU. Also, at various times during December 2003, ALEXANDRU and CERNA both used false identification documents that purported to have been issued by the State of Tennessee when receiving Western Union wire transfers in alias names. At times, ALEXANDRU has collected fraud proceeds at the same currency exchange on the same date as CERNA, HANN, LADISLAU, and NANAU.

30. **RADU RIZESCU** - RIZESCU has received (using approximately 3 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between April 2004 and July 2004 in amounts totaling approximately \$85,000. When collecting fraud proceeds, RIZESCU has at times provided to Western Union the same telephone number as LADISLAU. At various times during late March 2004 through late April 2004, RIZESCU, as well as CERNA, CONSTANTIN, IANC, LADISLAU, and SALEM, used false identification documents that purported to have been issued by the State of Nevada when receiving Western Union wire transfers in alias names. In April 2004, one victim of the scheme, after initially being instructed to wire transfer funds to an alias used by RADU RIZESCU, was later instructed to change the receiver to an alias used by LADISLAU. In July 2004, another victim of the

scheme, after initially being instructed to wire transfer funds to an alias used by RIZESCU, was later instructed to change the receiver to an alias used by SALEM. Telephone records show that on the day after RIZESCU was arrested by the Arlington Heights Police Department in July 2004, his number was in contact with telephone numbers subscribed to by CONSTANTIN, GANESCU, and SIMON.

31. **GIANINA SIMON** - SIMON has received (using approximately 4 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between September 2004 and August 2005 in amounts totaling approximately \$74,000. On at least one occasion, SIMON collected fraud proceeds at the same currency exchange on the same date as ASLAN. At various times in April 2005, SIMON, as well as IANC, LADISLAU, and GANESCU, used false identification documents that purported to have been issued by the State of Connecticut when receiving Western Union wire transfers in alias names. Telephone records show that on the day after RIZESCU was arrested by the Arlington Heights Police Department in July 2004, his number was in contact with a telephone number subscribed to by SIMON. Law enforcement has learned from various sources that SIMON is married to GANESCU.

32. **CRISTIAN BENTAN** - BENTAN has received (using approximately 4 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between December 2004 and October 2005 in amounts totaling approximately \$67,000. BENTAN was arrested by the Evanston Heights Police Department in October 2005 after

attempting to pick up fraud proceeds transmitted via Western Union to a currency exchange. After his arrest, BENTAN made a statement to law enforcement indicating that he was picking up money transfers generated through eBay fraud by members of the Romanian mafia.

33. **STEFAN LAURENTIU DUMITRU** - DUMITRU has received (using approximately 6 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between March 2005 and June 2005 in amounts totaling approximately \$58,000. At times, DUMITRU has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, FECHETE, MOLOMAN, and PANAITESCU. At various times between mid-February 2005 and mid-March 2005, DUMITRU, as well as CONSTANTIN, FECHETE, LUCAN, and MOLOMAN, used false identification documents that purported to have been issued by the State of Vermont when receiving Western Union wire transfers in alias names. At various times during April 2005, DUMITRU, as well as PANAITESCU and MOLOMAN, used false identification documents that purported to have been issued by the State of Michigan when receiving Western Union wire transfers in alias names. Western Union checks issued to pay out wire transfers of fraud proceeds sent to two aliases used by DUMITRU have been deposited into a bank account maintained in the name of IOAN MOLOMAN.

34. **MUSZKA LADISLAU** - LADISLAU has received (using approximately 4 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to

currency exchanges in the Chicago area at various times between April 2005 and July 2005 in amounts totaling approximately \$57,000. When collecting fraud proceeds, LADISLAU has at times provided to Western Union the same telephone number as RIZESCU. At times, LADISLAU has collected fraud proceeds at the same currency exchange on the same date as ALEXANDRU, NANAU and RIZESCU. In April 2004, one victim of the scheme, after initially being instructed to wire transfer funds to an alias used by RADU RIZESCU, was later instructed to change the receiver to an alias used by LADISLAU.

35. **CONSTANTIN REMUS LUCAN** - LUCAN has received (using approximately 3 aliases and his true name) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between December 2004 and July 2005 in amounts totaling approximately \$56,000. When collecting fraud proceeds, LUCAN has at times provided to Western Union the same address and telephone number as MOLOMAN. At times, LUCAN has collected fraud proceeds at the same currency exchange on the same date as FECHETE, MOLOMAN, and LUCIAN NANAU. At various times between mid-February 2005 and mid-March 2005, LUCAN, as well as CONSTANTIN, DUMITRU, FECHETE, and MOLOMAN, used false identification documents that purported to have been issued by the State of Vermont when receiving Western Union wire transfers in alias names. Western Union checks issued to pay wire transfers of fraud proceeds sent to an alias used by LUCAN have been deposited into two bank accounts maintained by IOAN MOLOMAN.

36. **MIHAI PANAITESCU** - PANAITESCU has received (using approximately 2 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between March 2005 and April 2005 in amounts totaling approximately \$45,000. At times, PANAITESCU has collected fraud proceeds at the same currency exchange on the same date as CONSTANTIN, DUMITRU, IANC, MOLOMAN, and SALEM. At various times during April 2005, PANAITESCU, as well as DUMITRU and MOLOMAN, used false identification documents that purported to have been issued by the State of Michigan when receiving Western Union wire transfers in alias names. Telephone number (602) 327-4694 has been provided to Western Union, MoneyGram, and Washington Mutual Bank as a telephone number for PANAITESCU. Records of telephone activity demonstrate that PANAITESCU's number has been in contact during relevant times with telephones associated with FECHETE and CERNA. MOLOMAN and PANAITESCU were charged as co-conspirators in another prosecution in this district (case no. 05 CR 553) relating to an ATM skim committed in the summer of 2005, and both have pleaded guilty in that case to conspiracy to commit access device fraud. PANAITESCU is currently in the custody of the USMS.

37. **LUCIAN NANAU** - NANAU has received (using approximately 2 aliases) fraud proceeds transmitted by victims of the scheme via Western Union to currency exchanges in the Chicago area at various times between July 2005 and August 2005 in amounts totaling approximately \$42,000. When collecting fraud

proceeds, NANAU has provided to Western Union the same address and telephone number as ALEXANDRU. At times, NANAU has collected fraud proceeds at the same currency exchange on the same date as ALEXANDRU, LADISLAU, and LUCAN.

V. Details of evidence demonstrating the Subjects' participation in the scheme to defraud

A. Information received from interviews of Subjects

1. Information regarding the fraud scheme received from GARY MICHAEL SCHNEIDER

38. GARY MICHAEL SCHNEIDER is a target of this investigation and a Subject of this Affidavit. SCHNEIDER has been cooperating with the government since approximately October 2005, when he was arrested in Cook County on a warrant issued out of Fillmore County, Minnesota, for fraud. The charges underlying the Minnesota warrant resulted from criminal conduct that is also the subject of this Federal investigation. SCHNEIDER has been cooperating in hopes of receiving consideration at sentencing in the instant case, although at this time the government has made no promises to SCHNEIDER regarding the consideration for his cooperation.

39. According to SCHNEIDER, he met one of the targets of this investigation, ADRIAN FLORIN FECHETE, in approximately December 2004. SCHNEIDER knew FECHETE by the name Ade (ah-dee). In approximately July 2005, according to SCHNEIDER, FECHETE recruited SCHNEIDER to engage in money pick-ups from Western Union. According to SCHNEIDER, SCHNEIDER did

so for approximately one week in exchange for a portion of the cash received.¹

Although FECHETE did not tell SCHNEIDER the source of the funds at the outset, SCHNEIDER stated that he later learned that the victims believed that they were purchasing things like cars and other expensive items through an internet service like eBay.

40. After making money pick-ups in his own name for FECHETE, SCHNEIDER began to recruit friends and acquaintances to make the pick-ups. Whenever SCHNEIDER found someone new to pick-up money, according to SCHNEIDER, he would provide that person's name to FECHETE, usually by text message to be sure the spelling was right. According to SCHNEIDER, FECHETE then passed the information to individuals in Romania. The Romanians running the fraud scheme would use the name to tell one or more victims of the fraud scheme to send the purchase money to that person in Chicago. FECHETE would tell SCHNEIDER when there was money to be picked up, and give SCHNEIDER the necessary information - money transfer control number, recipient name, amount, sender - to pick it up. According to SCHNEIDER, FECHETE received this information from people in Romania through text messages to his cellphone or through the internet. FECHETE provided the information he received from people in Romania to SCHNEIDER through text messages sent to SCHNEIDER's

¹Records obtained by investigators from Western Union indicate that SCHNEIDER was the recipient of approximately 14 wire transfers of funds between on or about July 12 and July 21, 2005, in amounts totaling approximately \$57,650.

cellphone or through FECHETE's girlfriends. SCHNEIDER advised that he then passed the information along to the individuals he had recruited to do the pick-ups.

41. According to SCHNEIDER, FECHETE told SCHNEIDER that 60% of the money that he and FECHETE picked-up at currency exchanges was to be transmitted to individuals in Romania. SCHNEIDER advised that he has transmitted funds at the direction of FECHETE to individuals in Romania, and has witnessed FECHETE doing the same. SCHNEIDER and FECHETE typically used the Moneygram service to send funds to Romania.

42. The information provided by SCHNEIDER to investigators has proven to be reliable in a number of ways, including the following. SCHNEIDER has recorded conversations with FECHETE in which FECHETE and SCHNEIDER discussed the fraud scheme and, as is further explained later in this Affidavit, law enforcement has discovered a number of aliases used by FECHETE to receive fraud proceeds. Additionally, investigators have obtained records from Moneygram and Western Union indicating that FECHETE has sent money on various occasions to Romania using a number of aliases. On or about March 9, 2006, law enforcement agents obtained an arrest warrant for FECHETE and a warrant to search his residence based, in part, upon information provided by SCHNEIDER. During the search of FECHETE's residence, agents recovered, among other items, a number of alias identification documents depicting FECHETE.²

²FECHETE is currently in the custody of the United States Marshals Service (USMS) in case no. 06 CR 160, pending before the Honorable Milton I. Shadur, where he is

43. Additionally, SCHNEIDER has provided to law enforcement the names of the various individuals that he recruited to pick up Western Union wire transfers of funds. At this time, based upon the statements of SCHNEIDER and other witnesses, records obtained from Western Union, currency exchanges, and from victims of the scheme, I believe that individuals recruited by SCHNEIDER to pick up money from Western Union on behalf of the organizers of this scheme received fraud proceeds on dozens of occasions in the summer of 2005 in amounts totaling approximately \$356,000.

2. Information derived during arrests of RAIMONDORAY CERNA

44. According to a CPD report, RAIMONDORAY CERNA, a native Romanian, was arrested by the CPD on March 6, 2004, and charged with possessing a false Nevada drivers license in the name of "Emanuel Fresco" which depicted CERNA. At the time that he was arrested, CERNA was in a vehicle with AIDA SALEM. SALEM was also arrested by CPD and charged with possessing a false Nevada driver's license in the name of "Mateo Benedetti" which depicted SALEM. The vehicle in which CERNA and SALEM had been traveling was impounded, inventoried, and found to contain more than \$7,000 in U.S. currency as well as

charged with possession of fraudulent identification documents, possession of a false Canadian passport, and aggravated identity theft. Records obtained from Canada and a forensic examination of the passport showed that the Canadian passport that Fechete possessed was issued by the Canadian government to another individual and was subsequently altered through substitution of a photograph depicting Fechete in place of the original photo.

Western Union wire transfer receipts.

45. After Federal law enforcement authorities learned of this arrest, CERNA was charged in a criminal complaint in the Northern District of Illinois for having unlawfully reentered the United States after a prior deportation to Romania.³ CERNA was located and arrested in Hallandale, Florida, on September 7, 2005.

46. At the time of his arrest, CERNA was in possession of two cellular telephones. CERNA's cellular telephones were searched subsequent to his arrest, and one of the cellular telephones was found to contain text messages with information that would have enabled CERNA to obtain a Western Union wire transfer of funds, such as sender name, address, dollar amount, and the unique money transfer control number (MTCN) assigned by Western Union to the wire transfers of funds. CERNA's telephone also contained evidence that it had been used to make calls to Romania.

47. At the time of his September 2005 arrest in Florida, CERNA was in the parking lot of an apartment complex at which MARIAN ALEXANDRU, another Romanian native and Subject of this investigation, appears to have resided.

³CERNA has pleaded guilty in case no. 05 CR 712 to having unlawfully reentered the country after a prior deportation. CERNA was sentenced on August 1, 2006, by the Honorable Ronald A. Guzman to serve 28 months imprisonment. CERNA is in the custody of the BOP.

Cerna's prior deportation occurred on or about July 14, 2003, subsequent to a Federal conviction in this district in case no. 02 CR 697. Cerna was arrested in that case while in possession of counterfeit checks and a false identification document that depicted Cerna as "Cosmin Curt."

ALEXANDRU was also arrested by authorities in Florida.⁴ At the time that ALEXANDRU and CERNA were arrested, authorities recovered a number of false identification documents depicting ALEXANDRU and CERNA. One of those documents falsely identified ALEXANDRU as "Marco Villarosa," a name used by ALEXANDRU to receive funds transmitted by victims of this scheme to defraud.

3. Information obtained from post-arrest interview of IGOR ASLAN on June 16, 2005

48. On June 14, 2005, IGOR ASLAN was arrested by the CPD after it received a complaint from a currency exchange employee. According to the currency exchange employee, an individual she later identified as ASLAN had several days previously picked up Western Union funds by presenting a driver's license that identified him as "Peter Bergen," and left the driver's license at the currency exchange after completing the transaction. The currency exchange employee summoned the CPD when ASLAN returned to the currency exchange on June 14, 2005, and attempted to pick up a Western Union wire transfer using a driver's license that depicted him as "Edmond Wolf."⁵

⁴ALEXANDRU was subsequently charged in the United States District Court for the Southern District of Florida with having unlawfully reentered the United States after a prior deportation in case no. 05 CR 60282-DTKH. ALEXANDRU pleaded guilty on October 10, 2006, and is scheduled to be sentenced on January 12, 2007. ALEXANDRU is in the custody of the USMS.

ALEXANDRU's prior deportation occurred on or about October 4, 2004, subsequent to arrest and conviction in Cook County in a prosecution involving use of fraudulent identification documents in the name of "Kaltz Goldman."

⁵ASLAN was charged and on or about September 2, 2005, he pleaded guilty in Cook County to one count of possessing a fraudulent identification card. Aslan was sentenced to

49. ASLAN was interviewed by law enforcement authorities on June 16, 2005. During the interview, ASLAN admitted, among other things, that he had been picking up money in alias names at Western Union locations. When asked to explain his actions, ASLAN stated that he believed that computer operators in Romania accessed certain websites (such as eBay) and advertised merchandise for sale that did not exist. According to ASLAN, Americans and Canadians who are interested in the merchandise send money via Western Union to locations in the United States where the funds are collected. ASLAN stated that he collected funds at the direction of another Romanian national, who paid him a 10% stipend based upon the amount of funds received. ASLAN identified CRISTIAN BENTAN as another individual participating in the scheme.

**4. Information obtained from post-arrest interview of
CRISTIAN BENTAN on October 28, 2005**

50. On October 28, 2005, CRISTIAN BENTAN was arrested by Evanston Police Department after he attempted to pick-up a Western Union wire transfer of funds at a currency exchange located in Evanston. At the time of his arrest, BENTAN was in possession of an Indiana driver's license in the name of "Roberto Fiorenza" which bore a photograph depicting BENTAN.

51. After his arrest, BENTAN waived his *Miranda* rights and agreed to make a statement. In summary, BENTAN stated that several months previously he had met a member of the Romanian mafia who offered him a 20% cut in

30 months imprisonment.

financial transactions. According to BENTAN, members of the Romanian mafia in Romania offer items for sale on eBay. After a buyer was found and willing to send money, BENTAN was sent a text message to his cellphone which provided him with a Western Union tracking or identification number, the buyer's information, and the name he should assume when picking up the money transfer. BENTAN admitted that he would then obtain a fraudulent identification card⁶ in the name provided in the text message and use that identification card to pick up the money. According to BENTAN, he would notify his Romanian contact that he had received the money, drop off the money at a specified location, and keep 20% of the proceeds. BENTAN stated that he had been engaging in this conduct 4 to 5 times per month for several months.

5. Information obtained from arrests of MIHAI BLEDEA

52. MIHAI BLEDEA, a Romanian native, was arrested by the Hillside Police Department on August 21, 2006. BLEDEA had filled out an application to receive a Western Union wire transfer of funds in which he had identified himself as "Nicholas Henrickson." An employee of the currency exchange called the police after recognizing BLEDEA as an individual who had received Western Union wire transfers under a number of different names. BLEDEA was stopped by law

⁶For example, BENTAN admitted during the interview that he had purchased a false Indiana driver's license (no. 0412-87-9865) in the name of "Roberto Fiorenza," and another false Indiana driver's license (no. 041-99-3877) in the name of "Paul Bigotti" and used them to receive and attempt to receive wire transfers. BENTAN's use of the name "Paul Bigotti" is further discussed in ¶ 141.

enforcement in his vehicle shortly after he fled the currency exchange. BLEDEA fled the currency exchange, according to the employee, after noticing the employee make a telephone call.

53. BLEDEA was arrested and during a search of his vehicle, a number of items were found, including alias identification documents, Western Union receipts, and two cellular telephones. BLEDEA provided written consent to law enforcement to search his cellular telephones. One of BLEDEA's cellular telephones contained text messages with information that could be used to obtain a Western Union wire transfer of funds, such as name, address, dollar amount, and MTCN. In addition, BLEDEA possessed a business card for a business called the "Sweat Zone" which identified GABRIEL CONSTANTIN as a "Trainer," with a cellular telephone number of (773) 216-1564. According to Illinois Secretary of State incorporation records, MUSZKA LADISLAU is the President of The Sweat Zone, Inc.

54. According to a CPD report, BLEDEA was previously arrested by the CPD on June 6, 2005, after he attempted to receive a Western Union wire transfer of funds using a fictitious Wisconsin driver's license that depicted BLEDEA as "Michael Krups." After his arrest, additional fictitious Wisconsin's driver's licenses were recovered by CPD from BLEDEA's vehicle.

B. Information obtained from records maintained by Western Union and currency exchanges

1. Background information on the use of Western Union services in the scheme to defraud

55. The Foreign Co-Schemers have developed victims through fraudulent

advertisements of items for sale on internet forums, typically eBay. Based upon the information described above and other information obtained during the investigation, I believe that the Foreign Co-Schemers have concluded that victims in the United States and Canada would be more likely to be duped into transmitting their money if the funds were directed to an individual located in the United States.

56. As a result, I believe that the Foreign Co-Schemers have developed a network of individuals in the United States, including the Subjects of this Affidavit, willing to repeatedly pick-up fraud proceeds (either personally or through others recruited by the Subjects) transmitted by the victims via Western Union. For providing this service to the Foreign Co-Schemers, the Subjects of this Affidavit maintained a portion (typically 30% to 50%) of the fraud proceeds collected, transmitting the balance to Romania through various means.

57. Because repeatedly presenting oneself to Western Union in one's true identity to receive fraud proceeds would present an obvious risk of apprehension by law enforcement, I believe that the Subjects of this investigation have learned or were instructed to repeatedly obtain alias identification documents in order to disguise their true identity when picking up fraud proceeds from Western Union agents, or to recruit other individuals to make the pick-ups on the Subjects' behalf.

58. Operating the scheme to defraud in this manner necessitated communication between the Foreign Co-Schemers and those receiving the fraud proceeds in the United States. Based upon information received from various

sources during the investigation, I believe that this communication generally took place in the following fashion. On a continuing basis, the Subjects of this Affidavit (generally located in the vicinity of Chicago) communicated to the Foreign Co-Schemers their changing aliases, or the names of the individuals recruited by the Subjects to receive wire transfers at the direction of the Subjects. I further believe that the names provided by the Subjects to the Foreign Co-Schemers were then incorporated by the Foreign Co-Schemers into their internet communications with potential fraud victims, usually as the "seller," "seller's agent," or "eBay agent" for the item being offered for sale. Once a particular victim agreed to purchase an item, he or she was directed to send the funds via Western Union to one of the names provided by the Subjects to the Foreign Co-Schemers.

59. In a typical Western Union wire transfer involving the purchase of merchandise on-line, Western Union issued to the purchaser of an item a unique "money transfer control number," also known as an "MTCN," at the time the purchaser funded the wire transfer. The MTCN served as confirmation from Western Union that payment had been received by Western Union or one of its agents (such as a currency exchange) from the purchaser. The purchaser would then communicate the MTCN to the payee in order to confirm that payment for the item had been made by the purchaser and was ready to be received from Western Union.

60. In order to receive a wire transfer of funds from Western Union, the individual presenting himself or herself as the authorized payee was generally

required to provide one or more photographic identification documents and to complete an application for receipt of the funds. In the application form, the recipient provided personal information about himself or herself (such as name, address, telephone number), and additional details relating to the transaction, such as the amount of funds to be received and name and location of the sender. One of the items that the payee generally provided to the Western Union agent on the application to receive funds was the unique MTCN issued by Western Union to the sender of the funds.

61. Thus, in the context of this scheme to defraud, once a victim had succumbed to the scheme by providing funds to Western Union, the victim generally communicated the MTCN to the Foreign Co-Schemers via the internet, cellular telephone, or fax in order to confirm for the "seller" that the victim had paid for the item he or she had agreed to "purchase," and that the funds were ready to be received from Western Union. Based upon a variety of information obtained during this investigation, I believe that in order to facilitate receipt of the funds by the Subjects, the Foreign Co-Schemers communicated the MTCNs and other transactional data (name and location of sender of funds, amount to be received) provided by the victims to the Subjects via text message, e-mail, and telephone. Upon receiving this information, the Subjects presented themselves, with an alias identification document, to a Western Union agent as the authorized payee for a wire transfer of funds from one of the victims of the fraud scheme. Alternatively, in those instances where the Subjects had recruited another individual to make a

Western Union pick-up at the direction of one of the Subjects, the Subject communicated the necessary information to the "recruitee" and directed that individual to pick-up funds that had been transmitted by the victim.

2. Evidence derived from review of Western Union and currency exchange records

a. Identification of aliases employed by the Subjects

62. At various times during the investigation, law enforcement agents participating in the investigation have had the opportunity to view a number of the Subjects of this Affidavit in person, for example, during court proceedings, subsequent to arrest by other law enforcement authorities, or while conducting surveillance. In addition, law enforcement has had the opportunity to review photographs of many of the Subjects of this Affidavit maintained in various records, for example, in immigration-related files, arrest records, surveillance camera photographs and videotapes, and identification documents such as driver's licenses and passports. Also, in some instances, witnesses have reviewed photographs and provided information to law enforcement regarding the identity of the individuals depicted.

63. Many Western Union agents in the Chicago area required those presenting themselves as an authorized payee of a wire transfer to permit the agent to retain a photocopy of the payee's photo identification. I have reviewed photocopies of identification documents associated with hundreds of Western Union wire transfers relating to the scheme to defraud, as well as identification documents

seized by law enforcement, and documents retained by Western Union agents after the Subjects aborted transactions in which they had attempted to receive funds.

64. In this manner, I have identified the following as aliases employed by the Subjects of this Affidavit when receiving and attempting to receive fraud proceeds from Western Union agents, or to transmit funds abroad to countries such as Romania. Furthermore, for each name noted below, I have recovered originals or copies of the identification documents used by the Subjects in such transactions:⁷

True name (value of transactions)	Alias identification documents used in the scheme
ADRIAN FLORIN FECHETE (\$170,000)	Antonio Barelli, Nicolae Damian, Dan Ghetu, Florin Ghioc, Ramon Sanchez Liriano, Marco Madzen, Adrian Munteanu, Mario Roseti, Emilio Vertan, Mario Zeneti, Marco Zepelini
RAIMONDORAY CERNA (\$407,000)	Nicholas Berty, Luca Brazzi, Marco Danielovic, Lucio Delarrosa, Sebastian Forte, Emanuel Fresco, Diminic LaMonte, Luigi Lentini, Anthony Marino, Darius Michette, Vasile Musoiu, Shannon Moore, Christian Palleto, David Pirlo, Marian Preda, Cristian Sava, Dobrinel Taralunga, David Toma

⁷ The figures in the table for the number of instances in which the Subjects picked up fraud proceeds and the dollar value of those transactions is an estimate based upon information available at the time of the filing of this Affidavit. These figures may change as the investigation progresses. In some instances, a Subject may have picked up fraud proceeds using what has been listed in the table above as their "true name." In such instances, the summary figure for number of transactions and total dollar value include transactions in which the Subject used his or her "true name."

True name (value of transactions)	Alias identification documents used in the scheme
AIDA SALEM (\$321,000)	Paul Anderson, Mateo Benedetti, Daniel Chirila, Jarno Fortini, Fabio Grasso, David Hedaya, Angelo Maiden, Andy Manzo, James Marsden, Joel Morales, Antonio Pagano, Chaz Paltrow, Georghe Percu, Meachel Savani, Brent Spinner, Pierre Sylva, Antony Vendetti, Armand Zemic
GABRIEL CONSTANTIN (\$297,000)	Diego Bagio, Andrea Borlano, David Cameron, Nico Cheruti, Gigi DiAugustino, Damian Fargo, Giorgio Mancino, George Marvin, Felipe Pachotti, Marco Patresse, Mario Vincen
ADRIAN IANCI (\$296,000)	Luca Brambilla, Mark Carrus, Peter D'Amato, Mark Dennie, Thomas Ferrell, Michael Fisher, George Gassman, Koen Martens, Peter Pall, Vick Rasalingham, Brandon Robson, Benjamin Ruth, Rick Vizer, Norbert Weiss
MIHAI BLEDEA (\$273,000)	Robert Brannik, Brian Carwardine, Alex Clapton, Albert Cossa, James Devaro, James Hastings, Nicholas Henrickson, Andrew Hofferma, Michael Horner, Scott Jenken, Andres Klin, Michael Krups, Michael Leskinen, Alex Manden, Vladimir Mysik, Samuel Pioletti, Anthony Verlofsky
MIHAIL EUGEN HANN (\$184,000)	David Haugel, Anthony Marconi, Alan Marrullier, Daniel Neamtu
IGOR ASLAN (\$167,000)	Peter Bergen, Michael Faragot, Omar Ladislau, John Richard, Nik Robertson, William Rogers, Tam Silverado, Karl Wagner, Edmund Wolf
IOAN MOLOMAN (\$163,000)	Sobe Krakov, Jean LaCroix, Andre Mihailovich, Pat Nelson, Marcel Popescu, Pierre Roche, Daciola Sandro, Roland Simpson, David Wilfred

True name (value of transactions)	Alias identification documents used in the scheme
BOGDAN GANESCU (\$98,000)	Brian Bradman, Joseph Disl, Stanley Hegarty, Martin Lake, Aleksandr Leino, Leonardo Vestal
MARIAN ALEXANDRU (\$94,000)	Meir Arous, Alex Bruno, Roy Bruno, Kaltz Goldman, Marco Villarosa
RADU RIZESCU (\$85,000)	Fabian Hira, Kevin Kozar, Antonio Muscani
GIANINA SIMON (\$74,000)	Claudia Albin, Andrea Beck, Paula Brunick, Nichol Mirman
CRISTIAN BENTAN (\$67,000)	Alberto Bagio, Paul Bigotti, Roberto Fiorenza, John Raynolds
CONSTANTIN REMUS LUCAN (\$56,000)	Pasquale DiPalma, Giuseppe Giovanni, Massimo Proetti
STEFAN LAURENTIU DUMITRU (\$58,000)	Criss Becli, Eugen Berge, Wilhelm Busch, Alexander Geremi, Silviu Tudor Macovei, Warren Walsh
MUSZKA LADISLAU (\$57,000)	Zoltan Both, Almos Halasz, Arpad Kallo, Alvin Kolmar
MIHAI PANAITESCU (\$45,000)	Dany Makow, Paolo Verone
LUCIAN NANAU (\$42,000)	Philip Dormier, Joe Meyers

b. Other information derived from Western Union and currency exchange records

65. Western Union has provided to law enforcement transactional data in a spreadsheet format pertaining to the wire transfers of funds that are the subject of this investigation. Review of this transactional data has revealed that the Subjects of this investigation often provided the same street address to Western Union

agents when receiving wire transferred funds, as further illustrated below⁸:

Payee Address	Alias (true name)	Date
1470 North Ave	Diego Bagio (CONSTANTIN) David Pirlo (CERNA)	March 2004 March 2004
1901 N. Western	Vasile Musoiu (CERNA) Pierre Roche (MOLOMAN) Pat Nelson (MOLOMAN) Kevin Bowman (MOLOMAN)	December 2003 December 2004 December 2004 January 2005
1932 Brunswick Ave	Roy Bruno (ALEXANDRU) Joe Myers (NANAU)	August 2005 August 2005
2140 Sheffield	Peter Bergen (ASLAN) Marco Patresse (CONSTANTIN)	June 2005 July 2005
2200 W. Armitage	Kaltz Goldman (ALEXANDRU) Lucio Delarrosa (CERNA)	March 2004 March 2004
2411 W. Devon	Rick Vizer (IANC) Jarno Fortini (SALEM) Joel Morales (SALEM)	July 2004 July 2004 July 2004
4900 W. Foster	Mario Zeneti (FECHETE) Meir Arouas (ALEXANDRU)	March 2005 June 2005
5521 N. Laramie	Damian Fargo (CONSTANTIN) Paul Anderson (SALEM) Andy Manzo (SALEM)	April 2005 April 2005 April 2005
6525 N. Sheridan	Pat Nelson (MOLOMAN) Remus Constantin Lucan (same)	December 2004 December 2004
7010 N. Ashland	Pat Nelson (MOLOMAN) Andre Mihailovich (MOLOMAN) Adrian Munteanu (FECHETE) Mario Roseti (Fechete)	November 2004 November 2004 February 2005 March 2005
900 N. Michigan	Gigi DiAugustino (CONSTANTIN) Nicolas Berty (CERNA)	February 2004 February 2004

⁸Dates presented in the table may not include all dates associated with the use of the corresponding identities and addresses. Also, in most instances, the Subjects provided additional addresses to Western Union during the month indicated.

66. Review of this Western Union transactional data also showed that the Subjects on numerous occasions provided common telephone numbers to Western Union when receiving wire transferred funds, as further illustrated below⁹:

Telephone number	Alias (true name)	Date
(312) 218-2002	Damian Fargo (CONSTANTIN) Marco Patresse (CONSTANTIN) Peter Bergen (ASLAN)	April 2005 June 2005 June 2005
(312) 470-5116	Joe Meyers (NANAU) Roy Bruno (ALEXANDRU)	August 2005 August 2005
(312) 796-4421	Nicolas Berty (CERNA) Diminic Lamonte (CERNA) Lucio Delarrosa (CERNA) Gigi DiAugustino (CONSTANTIN)	January 2004 January 2004 February 2004 February 2004
(773) 441-9121	Zoltan Both (LADISLAU) Antonio Muscani (RIZESCU)	April 2004 April 2004
(773) 807-6499	Florin Ghioc (FECHETE) Dan Ghetu (FECHETE) Adrian Munteanu (FECHETE) Armand Zemic (SALEM) Meachel Savini (SALEM) Angelo Maiden (SALEM) Mario Zeneti (FECHETE) Subject A (unknown) Andy Manzo (SALEM) George Marvin (CONSTANTIN) Damian Fargo (CONSTANTIN) Paul Anderson (SALEM)	February 2005 February 2005 February 2005 February 2005 March 2005 March 2005 March 2005 March 2005 April 2005 April 2005 April 2005 April 2005
(773) 827-6499	Munteanu Adrian (FECHETE) Angelo Maiden (SALEM)	February 2005 March 2005

⁹Telephone numbers presented in the table may not include all dates associated with the use of the corresponding identities and telephone numbers. Also, in most instances, the Subjects provided additional telephone numbers to Western Union during the month indicated.

Telephone number	Alias (true name)	Date
(773) 936-2367	Antonio Pagano (SALEM) Fabio Grasso (SALEM) Luigi Lentini (CERNA) Pat Nelson (MOLOMAN)	March 2004 April 2004 April 2004 November 2004
(773) 994-3088	Pasquale DiPalma (LUCAN) Remus Constantin Lucan (same) Pat Nelson (MOLOMAN) Massimo Proetti (LUCAN)	August 2004 December 2004 December 2004 February 2005

67. Review of this Western Union transactional data also showed that on numerous occasions the Subjects utilized the same Western Union agent on the same day to receive fraud proceeds, as further illustrated below:

Western Union agent	Alias (subject)	Date
Broadway Irving Park C.E. 4000 N. Broadway	Alex Bruno (ALEXANDRU) Dobrinel Taralunga (CERNA)	12/19/03
New Clark Lunt C.E. 7000 N. Clark	Alex Bruno (ALEXANDRU) Shannon Moore (CERNA)	12/22/03 & 01/02/04
AZ Zenith C.E. 1938 W. North Ave.	Dobrinel Taralunga (CERNA) Giorgio Mancino (CONSTANTIN)	01/12/04
New Lincoln Foster C.E. 5204 N. Lincoln Ave.	Kaltz Goldman (ALEXANDRU) Lucio Delarrosa (CERNA)	03/09/04
New Irving Austin C.E. 6000 W. Irving Park	Antonio Muscani (RIZESCU) Zoltan Both (LADISLAU)	04/19/04
Armitage Kedzie C.E. 3200 W. Armitage	Armand Zemic (SALEM) Florin Ghico (FECHETE)	01/27/05
Armitage Kedzie C.E. 3200 W. Armitage	Adrian Munteanu (FECHETE) Daciola Sandro (MOLOMAN) Massimo Proetti (LUCAN)	02/21/05
Morse Avenue C.E. 1356 W. Morse Ave.	Mario Roseti (FECHETE) Meachel Savini (SALEM)	03/08/05
Foster C.E. 3443 W. Foster	Eugene Berge (DUMITRU) Mario Zeneti (FECHETE)	03/19/05

Western Union agent	Alias (subject)	Date
Morse Avenue C.E. 1356 W. Morse Ave.	Subject A (unknown) George Marvin (CONSTANTIN)	03/30/05
Chicago Main C.E. 635 Chicago, Av., Evanston	Paolo Verone (PANAITESCU) Roland Simpson (MOLOMAN)	04/01/05
Chicago Main C.E. 635 Chicago, Av., Evanston	Andy Manzo (SALEM) George Marvin (CONSTANTIN) Paolo Verone (PANAITESCU) Vick Raslingham (IANC)	04/05/05
Foster C.E. 3443 W. Foster	Dany Makow (PANAITESCU) George Marvin (CONSTANTIN) Vick Raslingham (IANC)	04/06/05
Superior Foodmart 5723 N. California Ave.	Criss Becli (DUMITRU) George Marvin (CONSTANTIN) Roland Simpson (MOLOMAN)	04/06/05
Morse Avenue C.E. 1356 W. Morse Ave.	Dany Makow (PANAITESCU) Subject A (unknown) Roland Simpson (MOLOMAN)	04/07/05
Morse Avenue C.E. 1356 W. Morse Ave.	Criss Becli (DUMITRU) Subject A (unknown)	04/08/05
Foster C.E. 3443 W. Foster	Criss Becli (DUMITRU) Damian Fargo (CONSTANTIN) Dany Makow (PANAITESCU)	04/09/05
New Pulaski Diversey C.E. 2739 N. Pulaski	Dany Makow (PANAITESCU) David Wilfred (MOLOMAN)	04/10/05
Foster C.E. 3443 W. Foster	George Marvin (CONSTANTIN) Vick Raslingham (IANC)	04/11/05
Superior Foodmart 5723 N. California Ave.	Jean LaCroix (MOLOMAN) Paul Anderson (SALEM)	04/16/05
Wilson-Western C.E. 4552 N. Western Ave.	Nik Robertson (ASLAN) Paula Brunick (SIMON)	04/28/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Damian Fargo (CONSTANTIN) Karl Wagner (ASLAN)	05/09/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Alan Marrullier (HANN) Marco Patresse (CONSTANTIN) Peter Bergen (ASLAN)	06/08/05

Western Union agent	Alias (subject)	Date
Grand & Hamlin C.E. 3746 W. Grand Ave.	Anthony Marconi (HANN) Meir Arouas (ALEXANDRU)	06/29/05
Superior Foodmart 5723 N. California Ave.	Pasquale DiPalma (LUCAN) Philip Dormier (NANAU)	07/05/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Subject B (unknown) Mark Dennic (IANC)	07/15/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Subject B (unknown) Anthony Marconi (HANN)	07/19/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Arpad Kallo (LADISLAU) Joe Myers (NANAU)	08/06/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Arpad Kallo (LADISLAU) Joe Myers (NANAU) Roy Bruno (ALEXANDRU)	08/08/05
Grand & Hamlin C.E. 3746 W. Grand Ave.	Arpad Kallo (LADISLAU) Joe Myers (NANAU)	08/09/05
Foster C.E. 3443 W. Foster	David Hedaya (SALEM) George Gassman (IANC)	01/09/06

68. In addition, a review of the Western Union transactional records and copies of the alias identification documents used by the Subjects revealed numerous instances in which it appeared that the Subjects were simultaneously using false identification documents that purported to have been issued by the same state, suggesting that the Subjects have at times shared a common source of false identification documents. For example, at various times during December 2003, RAIMONDORAY CERNA (aka "Lucian Iovanescu," "Daniel Toma") and MARIAN ALEXANDRU (aka "Alex Bruno") both used false identification documents that purported to be issued by the State of Tennessee when receiving Western Union wire transfers connected to the scheme to defraud.

69. As another example, at various times during January and February 2004, CERNA (aka "Sebastian Forte," "Nicholas Berty," "Diminic Lamonte") and GABRIEL CONSTANTIN (aka "Alberto Bagio," "Gigi DiAugustino") both used false identification documents that purported to be issued by the State of Ohio when receiving Western Union wire transfers connected to the scheme to defraud.

70. As another example, at various times during late March 2004 through late April 2004, CERNA (aka "Emanuel Fresco"), CONSTANTIN (aka "Alberto Bagio" and "Damian Grasso"), AIDA SALEM (aka "Mateo Benedetti," "Antonio Pagano"), RADU RIZESCU (aka "Antonio Muscani"), MUSZKA LADISLAU (aka "Zoltan Both"), and ADRIAN IANC (aka "Luca Brambilla") all used false identification documents that purported to be issued by the State of Nevada when receiving Western Union wire transfers connected to the scheme to defraud.

71. Also, at various times between mid-February 2005 and mid-March 2005, FECHETE (aka "Dan Ghetu", "Adrian Munteanu"), IOAN MOLOMAN (aka "Diciola Sandro"), CONSTANTIN REMUS LUCAN (aka "Samuel Proetti"), DUMITRU (aka "Eugen Berge") and CONSTANTIN (aka "David Cameron, "George Marvin") all used false identification documents that purported to be issued by the State of Vermont when receiving Western Union wire transfers connected to the scheme to defraud.

72. As another example, at various times during April 2005, ADRIAN IANC (aka "Vick Rasalingham"), BOGDAN GANESCU (aka "Stanley Hegarty"), MUSZKA LADISLAU (aka "Almos Halasz") and GLANINA SIMON (aka "Paula Brunick") all

used false identification documents that purported to be issued by the State of Connecticut when receiving Western Union wire transfers connected to the scheme to defraud.

73. As another example, at various times in early April 2005, STEFAN LAURENTIU DUMITRU (aka "Criss Becl"), MIHAI PANATESCIU (aka "Dany Makow"), and MOLOMAN (aka "Jean LaCroix") all used false identification documents that purported to be issued by the State of Michigan when receiving Western Union wire transfers.

74. Also, at various times in May 2005, IGOR ASLAN (aka "John Richard," "Karl Wagner"), and MIHAI BLEDEA (aka "Robert Brannik" and "Scott Jenken") used false identification documents that purported to be issued by the State of Wisconsin when receiving Western Union wire transfers connected to the scheme to defraud.

**3. Western Union fraud proceeds paid to numerous
Subjects traced to bank account of IOAN
MOLOMAN**

75. IOAN MOLOMAN¹⁰ maintained an account at Bank of America and at various times deposited into that account Western Union checks payable to at least

¹⁰IONIAN MOLOMAN and MIHAI PANAITESCU were previously charged in this district, in case no. 05 CR 553, with conspiring to violate 18 USC § 1029 as a result of having participated in an ATM skim in mid-2005. PANAITESCU and MOLOMAN pleaded guilty to that offense and are scheduled to be sentenced by the Honorable Elaine E. Bucklo on January 12, 2007, and February 9, 2007, respectively. PANAITESCU and MOLOMAN are both in the custody of the USMS. PANAITESCU's arrest occurred in December 2005 in Las Vegas after he was arrested by law enforcement while attempting to pick-up a Western Union wire transfer using an alias name.

one of his known aliases, "David Wilfred." Checks issued by Western Union to pay wire transfers of funds to a number of additional Subjects of this investigation were also deposited into MOLOMAN's Bank of America account during 2005, including the following:

Date of deposit	Western Union checks payable to alias (true name)
March 2005	"Meachel Savini" (Salem)
April 2005	"Criss Becli" and "Alexander Geremi" (Dumitru)
May 2005	"Marco Patresse" and "Damian Fargo" (Constantin)
July 2005	"Pasquale DiPalma" (Lucan)

76. MOLOMAN also maintained a bank account at Charter One Bank. Checks issued by Western Union to pay-out wire transfers of funds to a number of additional Subjects of this investigation were also deposited into MOLOMAN's Charter One Bank account during 2005. For example, on or about July 7, 2005, eight Western Union checks payable in amounts totaling \$7,970 to "Pasquale DiPalma" were deposited into the account. As noted above, "Pasquale DiPalma" is an alias that has been used by CONSTANTIN REMUS LUCAN as part of the scheme to defraud.

77. In addition, on or about August 3, 2005, a check payable to "Cristian Sava" in the amount of \$1,300 was deposited into MOLOMAN's Charter One Bank account. As previously noted above, "Cristian Sava" is an alias that has been used

by RAIMONDORAY CERNA as part of the scheme to defraud.

C. Information obtained from review of fraudulent internet advertisements provided by victims of the scheme

78. Thus far, law enforcement has obtained information from approximately 500 victims of the scheme. In many instances, the victims maintained copies of the fraudulent internet advertisements and other on-line communications that duped them into transmitting money to the Subjects of this Affidavit. Review of this material provided further evidence that the Subjects were working as part of a coordinated scheme to defraud with the Foreign Co-Schemers.

1. Common false statements and misrepresentations in the fraudulent internet solicitations

79. Review of material relating to the fraud scheme submitted by victims who transmitted funds to the Subjects of this Affidavit revealed that the majority of the internet solicitations incorporated logos and marks used by eBay, and other graphics that I believe were designed to falsely make it appear as though eBay was participating in some manner in the internet transaction.

80. Further review of materials relating to the fraud scheme submitted by victims revealed that a substantial percentage of the fraudulent solicitations devoted a portion of their text to a series of identical (or nearly so) false statements and representations designed to assure the victims that various protections offered by eBay would safeguard their funds if they participated in a financial transaction with the "seller" of the items for sale.

81. Many victims of the scheme received e-mails that featured a logo which

made it appear to have been sent by eBay's "Security Center," "Security & Resolution Center,"¹¹ or "Passenger Vehicle Purchase Protection"¹² program with a "Second Chance Offer" to "Buy The Item You Recently Bid On."

82. The "Security Center," "Security & Resolution Center," and "Passenger Vehicle Purchase Protection" solicitations often contained an identical (or nearly so) recitation of "protections" against fraud, all of which were false and fraudulent. This section of the "Security Center," "Security & Resolution Center," and "Passenger Vehicle Purchase Protection" solicitations falsely represented to the victims that (i) eBay (or in some instances, another well-established internet sales forum) played a role in the proposed transaction, (ii) the "seller" had funds on deposit in a "purchase protection account," (iii) the seller could not withdraw the funds from this account, (iv) the purchaser was "protected" from fraud, and (v) requests for refunds would be quickly honored and processed.

83. While the false and fraudulent representations and promises regarding the protections against fraud were not always identical, they were nearly so. The following is an illustrative example taken from an "Second Chance Offer" received by Victim PV on or about February 20, 2005, offering him the opportunity to

¹¹eBay maintains a "Security & Resolution Center" which, according to its website, appears to be designed to assist eBay users in resolving transactional disputes and reporting fraudulent activities, among other things.

¹²eBay does offer a "Vehicle Purchase Protection" program on the eBay Motors portion of its website. According to its website, the Vehicle Purchase Protection program "helps protect your vehicle purchase against fraud and material misrepresentation. This program is provided by eBay Motors for FREE on all eligible transactions completed on the eBay Motors site."

purchase a Kawasaki 4x4 ATV that he had previously bid upon. The email featured a logo that made it appear to have been sent by the eBay "Security Center" and directed Victim PV¹³ to send \$3,100 via Western Union to "Brian Carwardine" (MIHAI BLEDEA). The "Security Center" email featured the following false and fraudulent recitation of protections against fraud:

Currently, this seller has a US\$ 20,000 deposit in an eBay managed purchase protection account, as a safety measure in case something wrong happens with transactions involving the seller. Transactions with this eBay seller are covered by purchase protection against fraud and description errors. For your safety, this account was locked today, for 30 days time. The seller is unable to withdraw any money from it, within this period. Should you need a refund for this transaction, the insured amount will be taken from the seller's purchase protection account and sent to you. The refund is sent to your bank account, by check or money order at your will. You have 30 days from the above verification date to request a refund. Refund requests are processed within 3 working days. The insurer of this transaction is eBay Inc., located at 2145 Hamilton Avenue, San Jose, CA 95125, United State of America. The account is managed by eBay's Square Trade Center. This transaction is supervised and approved by eBay's Safe Harbor Team.

84. Victim PV sent \$3,100 to "Carwardine," and based upon records reviewed by law enforcement from Western Union and Victim PV, BLEDEA received the funds at the 1369 West Fullerton Currency Exchange in Chicago on February 21, 2005. Victim PV reported to law enforcement that although he transmitted the funds, he did not receive the Kawasaki ATV.

85. As another example, on or about March 2, 2005, Victim PK received a

¹³In all instances in this Affidavit in which I describe the experiences of an individual who was a victim of the scheme to defraud, my description is based upon review of materials submitted by the victim to law enforcement, as well as records received from Western Union and/or local currency exchanges.

"Second Chance Offer" to purchase a Kawasaki ATV that he had previously bid upon which featured a logo that made it appear to have been sent by eBay's "Security & Resolution Center." The email directed Victim PK to send \$2,150 via Western Union to "Meachel Savini" (AIDA SALEM), and featured the following false recitation of protections against fraud:

Currently, this seller has a US\$ 20,000 deposit in an eBay managed purchase protection account, as a safety measure in case something wrong happens with transactions involving the seller. Transactions with this eBay seller are covered by purchase protection against fraud and description errors. For your safety, this account was locked today, for 30 days time. The seller is unable to withdraw any money from it, within this period. Should you need a refund for this transaction, the insured amount will be taken from the seller's purchase protection account and sent to you. The refund is sent to your bank account, by check or money order. The way you are refunded is at your choice. You have 30 days from the above verification date to request a refund. Refund requests are processed within 3 days. The insurer of this transaction is eBay Inc., located at 2145 Hamilton Avenue, San Jose, CA 95125, United State of America. The account is managed by eBay's Square Trade Center. This transaction is supervised and approved by eBay's Safe Harbor Team.

86. Victim PK sent the funds to "Savini," and based upon records reviewed by law enforcement from Western Union and Victim PK, SALEM received the funds at the Morse Avenue Currency Exchange in Chicago on or about March 9, 2005. Victim PK reported to law enforcement that although he transmitted the funds, he did not receive the Kawasaki ATV.

87. As another example, on or about May 19, 2005, Victim JK received an email which featured a logo that made it appear to have been sent by eBay's "Passenger Vehicle Purchase Protection" program regarding a Toyota vehicle he had agreed to purchase after viewing it on eBay. The email directed Victim JK to

send \$4,500 via Western Union to MIHAIL EUGEN HANN in Chicago, and featured the following false recitation of protections against fraud:

Currently, this seller has a US\$ 5,000 deposit in an eBay managed purchase protection account. Transactions with this eBay seller are covered by purchase protection against fraud and description errors. For your safety, this account was locked today, for 30 days time. The seller is unable to withdraw any money from it, within this period. Should you need a refund for this transaction, the insured amount will be taken from the seller's purchase protection account and sent to you. The refund is sent to your bank account, or by check or money order. The way you are refunded is at your choice. You have 30 days from the above verification date to request a refund. Refund requests are processed within 3 days. The insurer of this transaction is eBay Inc., located at 2145 Hamilton Avenue, San Jose, CA 95125, United State of America. The account is managed by eBay's Square Trade Center. This transaction is supervised and approved by eBay's Safe Harbor team.

88. Victim JK sent the funds to HANN, and based upon records reviewed by law enforcement from Western Union and Victim JK, HANN received the funds at the 1369 West Fullerton Currency Exchange in Chicago on or about May 19, 2005. Victim JK reported to law enforcement that although he transmitted the funds, he did not receive the Toyota vehicle.

89. Similarly, a number of victims received email solicitations that featured the "Square Trade"¹⁴ logo which contained false and fraudulent representations substantially similar to those in the "Security Center," "Security & Resolution

¹⁴Although it is often associated with eBay, Square Trade is a business independent of eBay. Among other things, according to its website, Square Trade provides a mediation service for transactional disputes on sites such as eBay, and a verification service whereby sellers who demonstrate that they conform to certain business practices are permitted to display the Square Trade logo on their internet advertisements as a sign of the seller's reliability and trustworthiness.

Center,” and “Passenger Vehicle Purchase Protection” solicitations. For example, on or about August 8, 2005, Victim MK received instructions on how to purchase a 2002 Kubota tractor-loader that had been listed for sale on eBay. The email directed Victim MK to send \$2,900 via Western Union to “Claudia Alban” (GLANINA SIMON) in Chicago, and featured the following false and fraudulent recitation of protections against fraud:

Currently, the seller has a \$15,000 deposit in an eBay and Square Trade managed purchase protection account. Transactions with this eBay seller are covered by purchase protection against fraud and description errors. The insurer of this transaction is eBay Inc. The account is managed by eBay's Square Trade center. This transaction is supervised by eBay's SafeHarbor team. For buyers or sellers safety, if the owner of this account wants to withdraw the funds, he will have to wait at least 15 days from that day before the funds are released and the purchase protection account is closed The insured amount of the transaction will be taken from the seller's purchase protection account and refunded to you. The refund is sent to your bank account, or by check or money order. The way you are refunded is at your discretion. You have 15 days from the above verification date to request the refund. Refund requests are processed within 3 days.

90. Victim MK sent the funds to “Albin,” and based upon records reviewed by law enforcement from Western Union and Victim MK, SIMON received the funds at the Lawrence Damen Currency Exchange in Chicago on or about August 10, 2005. Victim MK reported to law enforcement that although he transmitted the funds, he did not receive the Kubota tractor-loader.

91. Documents received from the victims indicate that the same false representations and promises were in some instances utilized by the Foreign Co-Schemers to defraud users of Yahoo! sales forums. For example, on or about September 11, 2005, Victim JM received an email after negotiating on-line to

purchase for \$4,500 a 1998 Honda Prelude that had been listed for sale on Yahoo! Autos. The email directed Victim JM to send the funds via Western Union to an Individual SB,¹⁵ who had been recruited to pick-up money by SCHNEIDER and FECHETE in Chicago, and featured the following false recitation of protections against fraud:

Currently, this seller has a US\$ 5,000 deposit in an Yahoo! Autos managed purchase protection account. Transactions with this Yahoo! Autos seller are covered by purchase protection against fraud and description errors. For your safety, this account was locked today, for 30 days time. The seller is unable to withdraw any money from it, within this period. Should you need a refund for this transaction, the insured amount will be taken from the seller's purchase protection account and sent to you. The refund is sent to your bank account, or by check or money order. The way you are refunded is at your choice. You have 30 days from the above verification date to request a refund. Refund requests are processed within 3 days. The account is managed by Yahoo! Autos. This transaction is supervised and approved by Yahoo! Autos Safe Harbor Team.

92. Victim JM sent the funds to Individual SB and, based upon records reviewed by law enforcement from Western Union and Victim JM, Individual SB received the funds at the New North Central Currency Exchange in Chicago on or about September 14, 2005. Victim JM reported to law enforcement that although he transmitted the funds, he did not receive the Honda Prelude.

93. As previously discussed above, based upon the information received to date, I believe that there are more than 2,000 victims of this scheme. Law enforcement agents participating in this investigation thus far have received

¹⁵Individual SB has been interviewed by law enforcement and admitted that he was recruited by FECHETE and SCHNEIDER to pick-up Western Union wire transfers and to send funds via Western Union and Moneygram to Romania.

additional information from more than 500 of those victims regarding their communications with the Foreign Co-Schemers. Based upon a review of the materials submitted by those victims, as well as transactional data and documents obtained from Western Union and currency exchanges, I have thus far been able to confirm that 20 out of the 21 named Subjects received proceeds that were sent by victims who received fraudulent internet solicitations consistent with those described above.

2. Internet communications with victims demonstrating diversion of fraud proceeds from one Subject to another.

94. Review of materials submitted by the victims of this fraud scheme also demonstrate that in some instances the victims, after having agreed to "purchase" an item and after having been instructed to send payment via Western Union to one of the Subjects, were instructed by one of the Foreign Co-Schemer to divert the payment to another Subject. This information also suggests that the Subjects are working jointly with the Foreign Co-Schemers as part of an organized scheme to defraud.

95. While I have no first-hand knowledge as to why this occurred, in the context of this investigation there are a number of likely scenarios. For example, if one of the Subjects had communicated a particular alias to the Foreign Co-Schemers for purposes of receiving fraud proceeds, but was arrested or lost the alias identification document before funds transmitted by a victim could be retrieved, the victim's funds would be in the possession of Western Union ready for receipt, but

the Subjects would lack the identification document needed to obtain the funds from a Western Union agent. In such a situation, the Foreign Co-Schemer might conclude that the quickest way to obtain the victim's funds would be to instruct the victim to change the name of the payee for the wire transfer to another name currently available to the Subjects.

96. For example, on or about April 14, 2004, after bidding on an Advantest R3765AH Network Analyzer on eBay, Victim JM received an email notifying him that he had a "second chance" to buy the item because the winning bidder had been unable to complete the transaction. Victim JM agreed to purchase the network analyzer and, per instructions he received by email, sent \$2,066 via Western Union to the attention of "Antonio Muscani" in Chicago. "Antonio Muscani" is an alias that has been used by RADU RIZESCU. On April 16, 2004, Victim JM received an email instructing him to change the receiver to "Zoltan Both" due to "changes in account information," which Victim JM did on April 17, 2004. "Zoltan Both" is an alias that has been used by MUSZKA LADISLAU. The funds transmitted by Victim JM were received by "Zoltan Both" in Chicago, but Victim JM has reported that he did not receive the network analyzer.

97. As another example, Victim LC received a "second chance offer" to purchase a hot tub that she had seen for sale on eBay. On or about July 4, 2004, Victim LC was instructed to wire transfer \$3,000 to "Fabian Hira" in Chicago. "Fabian Hira" is an alias that has been used by RADU RIZESCU. On or about July 6, 2004, Victim LC was directed by email to change the name of the receiver to "Joel

Morales." "Joel Morales" is an alias that has been used by AIDA SALEM. Records from Western Union indicate that the \$3,000 sent by Victim LC were received by "Joel Morales" on or about July 9, 2004, at the Oakton & Waukegan Currency Exchange in Niles, Illinois. Victim LC did not receive the hot tub that he agreed to purchase.

98. As another example, on or about June 5, 2005, Victim KM agreed to purchase a pair of audio speakers for \$1,100, and was instructed by e-mail to send the funds via Western Union to the attention of "Peter Bergen," described to Victim KM as the seller's uncle. "Peter Bergen" is an alias that has been used by IGOR ASLAN. On or about June 7, 2005, Victim KM received an e-mail instructing him to call Western Union and change the receiver to "Marco Patresse," described to Victim KM as the seller's cousin. "Marco Patresse" is an alias that has been used by GABRIEL CONSTANTIN. According to the e-mail message, the change was necessary because "Bergen" was involved in a bike accident and was in the hospital. The funds transmitted by Victim KM were received by "Marco Patresse" on or about June 8, 2005, at the Grand and Hamlin Currency Exchange in Chicago, but Victim KM has reported that he did not receive the audio speakers that he agreed to purchase.

D. Information obtained from cellular telephones and telephone service provider records

99. Law enforcement has seized a number of telephones during the investigation, and has obtained records from telephone service providers regarding

the use of various telephones. Although law enforcement is continuing to gather such information, the information obtained thus far further shows that the Subjects have been in telephonic communication with one another while the scheme was on-going.

100. For example, law enforcement has obtained records from U.S. Cellular relating to telephone number (773) 319-1731. According to U.S. Cellular's records, the subscriber to this telephone number is "Florin Ghioc," an alias for FECHETE. Records of calling activity on the account show that this number was in contact with the following telephone numbers, among others, during February and March 2005:

Telephone no.	Used by ...
(773) 216-1564	GABRIEL CONSTANTIN according to business card seized from Mihai Bledea and subscriber records obtained from U.S. Cellular
(773) 209-1482	IOAN MOLOMAN according to Charter One bank account records
(773) 507-7344	BOGDAN GANESCU according to records obtained from U.S. Cellular
(602) 327-4694	MIHAI PANAITESCU according to records obtained from Western Union and MoneyGram, and Washington Mutual bank account records

101. As another example, law enforcement has obtained records from T-Mobile relating to telephone number (773) 704-2168. According to T-Mobile's records, the subscriber to this telephone number was RADU RIZESCU. RIZESCU was arrested by the Arlington Heights Police Department on July 2, 2004, after attempting to receive a Western Union wire transfer of funds by presenting a

driver's license that depicted RIZESCU but identified him as "Kevin Kozar."

Records of calling activity on RIZESCU's account on the day after his arrest show that his telephone number was in contact with the following telephone numbers:

Telephone no.	Used by ...
(773) 216-1564	GABRIEL CONSTANTIN according to business card seized from Mihai Bledea and subscriber records obtained from U.S. Cellular
(773) 216-1567	GIANINA SIMON, 675 Grove Drive, Elk Grove Village, according to subscriber records obtained from U.S. Cellular
(773) 507-7344	BOGDAN GANESCU, 675 Grove Drive, Elk Grove Village, according to subscriber records obtained from U.S. Cellular

102. As previously discussed above, RAIMONDORAY CERNA was arrested on or about September 7, 2005. At the time of his arrest, CERNA was in possession of a cellular telephone that was determined to have a telephone number of (702) 443-2362. Records from T-Mobile indicate that the subscriber to this telephone was "Cristian Ava." I have learned during this investigation that CERNA has used the alias name of "Cristian Sava" to transmit funds to Romania.

103. Records obtained from T-Mobile regarding calling activity for this telephone between January 1, 2005, and CERNA's arrest in September 2005 show that (702) 443-2362 was in contact with the following telephone numbers during the months in 2005 indicated:

Telephone no.	Months	Used by ...
(602) 327-4694	March, June, July, August	MIHAI PANAITESCU according to records obtained from Western Union and MoneyGram, and Washington Mutual bank account records

(773) 507-3376	April, June, July, August	ADRIAN FECHETE according to Gary Michael Schneider and records obtained from Western Union
(773) 354-7501	August	JESSY VEGA according SCHNEIDER, CW2, and CW3 ¹⁶
(773) 209-1482	January, March, June, July	IOAN MOLOMAN according Charter One bank account records

104. As previously described above, MIHAI BLEDEA was arrested by the Hillside Police Department on August 21, 2006. BLEDEA provided law enforcement agents with consent to search the cellular telephones in his possession. Agents discovered entries for numbers used by GABRIEL CONSTANTIN (773-216-1564) and BOGDAN GANESCU (773-507-7344) in the directory of one of BLEDEA's cellular telephones.

VI. Details regarding the participation of JESSIE VEGA in the scheme to defraud

A. Information provided by GARY MICHAEL SCHNEIDER

105. In addition to the information previously related above, SCHNEIDER has advised law enforcement that ADRIAN FLORIN FECHETE recruited an individual named JESSIE VEGA to pick up fraud proceeds transmitted via Western Union, and that VEGA in turn recruited a number of individuals who used their true names to pick up fraud proceeds on his behalf.

106. In summary, SCHNEIDER advised law enforcement that (i) VEGA ran

¹⁶Facts regarding the role of VEGA, CW2, and CW3 in the scheme to defraud are provided in ¶¶ 105-23 of this Affidavit.

a crew that collected fraud proceeds for VEGA on behalf of FECHETE, (ii) he has witnessed VEGA deliver fraud proceeds to FECHETE, (iii) and that SCHNEIDER has collected fraud proceeds from VEGA for FECHETE. As further described below, the information that SCHNEIDER has provided regarding VEGA has been corroborated through a number of sources.

107. For example, SCHNEIDER recalled that VEGA had a worker who did really well for him, and that FECHETE believed s/he did so well for VEGA because of her/his simple American name.

108. I have reviewed records provided by Western Union to law enforcement which indicate that a person using the name provided by SCHNEIDER received wire transfers in August 2005 on approximately 14 occasions in Chicago totaling approximately \$52,000.

B. Information provided by Cooperating Witness 1 (CW1)

109. Law enforcement recently interviewed CW1. Among other things, CW1 advised that on two days in June 2005, s/he was driven to currency exchanges to pick-up money by VEGA (who s/he knew only as "Jessy" LNU). CW1 stated that s/he was introduced to VEGA by someone who described VEGA as the owner of a car lot, and told CW1 that s/he would be picking up money related to car sales. CW1 said that s/he was paid \$50 after each pick-up at a currency exchange. At the conclusion of the interview, CW1 correctly identified VEGA from a photographic array depicting 5 young males.

110. I have reviewed records maintained by Western Union which indicate

that on or about June 23 and June 24, 2005, CW1 received wire transfers of funds on a total of 6 occasions at 6 different currency exchanges totaling approximately \$24,200. Thus far, 5 of the individuals who were directed to transmit funds to the attention of CW1 have complained to law enforcement that they were defrauded after trying to purchase an item that they saw advertised on the internet.

111. For example, on or about June 23, 2005, Victim AS received an email that featured a logo that made it appear to have been sent by eBay Motors "Passenger Vehicle Purchase Protection" program regarding an Audi automobile that Victim AS had agreed to purchase. The email directed Victim AS to send a \$4,000 deposit via Western Union to CW1, and featured the following false recitation of protections against fraud:

Currently, this seller has a US\$ 5,000 deposit in an eBay managed purchase protection account. Transactions with this eBay seller are covered by purchase protection against fraud and description errors. For your safety, this account was locked today, for 30 days time. The seller is unable to withdraw any money from it, within this period. Should you need a refund for this transaction, the insured amount will be taken from the seller's purchase protection account and sent to you. The refund is sent to your bank account, or by check or money order. The way you are refunded is at your choice. You have 30 days from the above verification date to request a refund. Refund requests are processed within 3 days. The insurer of this transaction is eBay Inc., located at 2145 Hamilton Avenue, San Jose, CA 95125, United State of America. The account is managed by eBay's Square Trade Center. This transaction is supervised and approved by eBay's Safe Harbor team.

112. Victim AS sent the funds via Western Union from a location in Ft. Lauderdale, Florida to the attention of CW1 and based upon records reviewed by law enforcement from Western Union and Victim AS, CW1 received the funds at the

State Ohio Currency Exchange in Chicago on or about June 24, 2005. Victim AS reported to law enforcement that although he transmitted the funds, he did not receive the Audi vehicle or a refund of his "deposit."

113. On or about June 23, 2005, Victim SR agreed on-line to purchase a Honda S2000 automobile that she saw advertised on eBay. An email message received by Victim SR on or about June 23, 2005, directed Victim SR to send a \$4,500 deposit to the attention of CW1 in Chicago. Victim SR communicated with the "seller" on-line for several days before agreeing to send a payment. On or about June 27, 2005, Victim SR received another email with payment instructions; this time the message directed Victim SR to send the \$4,500 deposit to "Ramon Sanchez Liriano," an alias used by FECHETE. After sending the \$4,500 to "Liriano," Victim SR was instructed to send an additional \$5,500. Victim SR refused to do so. Victim SR has not received the Honda vehicle or a refund of her \$4,500.

C. Information provided by CW2

114. Law enforcement also recently interviewed CW2. Among other things, CW2 advised that s/he was recruited by VEGA (who s/he knew only as "Jessie" LNU) to pick-up funds that were sent via Western Union to currency exchanges, and that VEGA paid her/him approximately \$200 for doing so over the course of several days in August 2005. CW2 stated that VEGA assisted her/him in completing the Western Union paperwork to receive the funds, and that VEGA received the information for the paperwork from text messages on VEGA's cellular telephone. At the conclusion of the interview, CW2 correctly identified VEGA from

a photographic array depicting 5 young males.

115. Records obtained from Western Union indicate that CW2 received wire transfers of funds on 7 occasions at 7 different currency exchanges during August 2005 in amounts totaling approximately \$30,499. Thus far, 4 of the individuals who were directed to transmit funds to the attention of CW2 have complained to law enforcement that they were defrauded after trying to purchase an item that they saw advertised on the internet.

D. Information provided by CW3

116. Law enforcement recently interviewed CW3. Among other things, CW3 said s/he has known VEGA for many years as a result of living in the same neighborhood. CW3 said that in the summer of 2005, VEGA recruited CW3 to pick-up money from Western Union currency exchanges. CW3 said that VEGA told her/him that people were wire transferring money as a result of having purchased vehicles from VEGA. According to CW3, VEGA told CW3 that VEGA did not have the necessary identification documents to pick up funds from Western Union, so VEGA was going to instruct the purchasers to send the money to the attention of CW3. According to CW3, VEGA said that he would pay CW3 for helping VEGA in this manner. CW3 said VEGA would generally drive CW3 to the currency exchanges, that VEGA provided CW3 with the necessary information to fill out the forms to obtain the wire transfers, and that VEGA sometimes accompanied CW3 into the currency exchanges. Subsequent to this interview, CW3 correctly identified VEGA from a photographic array depicting 5 young males.

117. CW3 said that on one occasion, VEGA called and told CW3 that VEGA was not available to do a planned money pick-up. VEGA told CW3 that another individual would accompany CW3. CW3 said that another male individual whom CW3 had not met previously did in fact meet with CW3 and drove CW3 to a currency exchange to receive funds.

118. After hearing this statement, law enforcement agents displayed a "six-pack" photospread of six males to CW3 to see if CW3 could identify the unknown male who accompanied CW3 to a currency exchange in place of VEGA. CW3 positively identified ADRIAN FLORIN FECHETE as the person who drove CW3 to the currency exchange in the place of VEGA.

119. Records obtained from Western Union indicate that CW3 received wire transfers of funds on 9 occasions at 6 different currency exchanges during late June 2005 in amounts totaling approximately \$ 35,000. Thus far, 3 of the 8 individuals who were directed to transmit funds to the attention of CW3 have complained to law enforcement that they were defrauded after trying to purchase an item that they saw advertised on the internet.

120. In addition to CW1 and CW2, whom CW3 also identified as VEGA recruits, CW3 identified five other individuals that for various reasons CW3 believed had also been recruited to pick up Western Union wire transfers by VEGA. Records obtained from Western Union indicate that these five individuals also picked up Western Union wire transfers of funds in the summer of 2005 in amounts totaling approximately \$192,000.

121. According to various law enforcement databases, on or about March 10, 2006, VEGA was charged by the Cook County State's Attorney's Office with a number of crimes, including commission of a felony while armed, aggravated unlawful possession of a weapon, and felony possession of a controlled substance. VEGA is currently released on bond. According to his CPD rap sheet, VEGA has been arrested 28 times

E. Information relating to VEGA's cellular telephone number

122. As previously described above, after the arrest of FECHETE on March 9, 2006, agents searched his cellular telephones. The name "Jesy" and number (773) 354-7501 appeared in the directory of one of FECHETE's cellular telephones. SCHNEIDER has advised law enforcement that he spoke with VEGA through telephone number (773) 354-7501. CW2 has provided to law enforcement copies of his/her cellular telephone bill for the relevant time period, and those records show contact between the cellphone of CW2 and telephone number (773) 354-7501. CW3 also advised law enforcement that (773) 354-7501 was VEGA's cellular telephone number, and that number, along with the name "Jessie," appeared in the directory of his/her cellular telephone at the time that he was interviewed by law enforcement.

123. Records obtained from the Metropolitan Correctional Center (MCC) in Chicago, Illinois, after the arrest of FECHETE show that on April 2, 2006, FECHETE placed a telephone call to (773) 354-7501 that lasted approximately 7 minutes. Law enforcement obtained a copy of this telephone call, which was

routinely recorded by the MCC. During the telephone call, FECHETE addressed the individual who answered the call as "Jessie." FECHETE and "Jessie" discussed the fact that they went "way back" together, and FECHETE indicated to "Jessie" that FECHETE needed to get a good lawyer. During the call, FECHETE asked "Jessie" to put Individual CB (a native of Romania) on the telephone so that FECHETE could speak with her. Several sources have advised law enforcement that VEGA is in a long-term relationship with Individual CB.

VII. Executions of the scheme to defraud

124. The scheme to defraud has been executed by wire thousands of times through the transmission of email messages to the victims that contained false and fraudulent representations and promises. The scheme to defraud has also been executed thousands of times through wire transfers of funds via Western Union from the victims to the Subjects of this Affidavit. The following paragraphs detail one execution of the scheme relating to each of the Subjects of this Criminal Complaint:

125. **FECHETE** - On or about February 10, 2005, Victim RB received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a 1981 Ford tractor that Victim RB had previously bid upon. Victim RB subsequently transmitted \$5,000 via Western Union from a location in Prairieville, Louisiana, to the attention of "Dan Ghetu" in Chicago, Illinois. Records obtained from the Armitage Kedzie Currency Exchange in Chicago indicate that the \$5,000 was received on or about February 12, 2005, by an individual who identified himself

in the application to receive funds and through presentation of a Vermont operator's license as "Dan Ghetu." Based upon review of a copy of the operators license maintained by the currency exchange and other information gathered during the investigation, I believe that ADRIAN FLORIN FECHETE is the individual depicted on the Vermont operator's license and the individual who received Victim RB's funds.

126. **CERNA** - On or about March 30, 2005, Victim RP received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a hickory smoker. Victim RP subsequently transmitted \$5,100.01 via Western Union from a location in Grand Rapids, Michigan, to the attention of "Luigi Lentini" in Chicago, Illinois. Records obtained from the Morse Avenue Currency Exchange in Chicago indicate that the \$5,100.01 was received on or about March 31, 2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported itself to be an identification document issued by the government of Quebec, as "Luigi Lentini." Based upon review of a copy of the identification document maintained by the currency exchange and other information gathered during the investigation, I believe that RAIMONDORAY CERNA is the individual depicted on the Quebec identification document and the individual who received Victim RP's funds.

127. **SALEM** - On or about March 2, 2005, Victim PK received an email purportedly from eBay's "Security & Resolution Center" offering him the opportunity to buy a Yamaha ATV that Victim PK had previously bid upon. Victim

PK subsequently transmitted \$2,085 via Western Union from a location in McKeesport, Pennsylvania, to the attention of "Meachel Savini" in Chicago, Illinois. Records obtained from the Morse Avenue Exchange in Chicago indicate that the \$2,085 was received on or about March 9, 2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported to be an Michigan operator license, as "Meachel Savini." Based upon review of a copy of the driver's license maintained by the currency exchange and other information gathered during the investigation, I believe that AIDA SALEM is the individual depicted on the driver's license and the individual who received Victim PK's funds.

128. **BLEDEA** - As previously described above in ¶¶83 and 84, on or about February 20, 2005, Victim PV received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a Kawasaki 4x4 ATV that Victim PV had previously bid upon. Victim PV subsequently transmitted \$3,100 via Western Union from a location in Oconomowoc, Wisconsin, to the attention of "Brian Carwardine" in Chicago, Illinois. Records obtained from the 1369 West Fullerton Currency Exchange in Chicago indicate that the \$3,100 was received on or about February 21, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a Wyoming driver license, as "Brian Carwardine." Based upon review of a copy of the driver license maintained by the currency exchange and other information gathered during the investigation, I believe that MIHAI BLEDEA is the individual depicted on the

drivers license and the individual who received Victim PV's funds.

129. **CONSTANTIN** - On or about July 4, 2005, Victim PB received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a 14 foot fishing boat that Victim PB had previously bid upon. Victim PB subsequently transmitted \$1,000 via Western Union from a location in Appleton, Wisconsin, to the attention of "Marco Patresse" in Chicago, Illinois. Records obtained from the Grand and Hamlin Currency Exchange in Chicago and Western Union indicate that the \$1,000 was received on or about July 5, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a Ohio driver license, as "Marco Patresse." Based upon review of a copy of the driver license maintained by the currency exchange and other information gathered during the investigation, I believe that **GABRIEL CONSTANTIN** is the individual depicted on the drivers license and the individual who received Victim PB's funds.

130. **IANC** - On or about April 1, 2005, Victim TV received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a Kawasaki motorcycle that Victim TV had previously bid upon. Victim TV subsequently transmitted \$3,908 via Western Union from a location in Stockton, California, to the attention of "Vick Rasalingham" in Chicago, Illinois. Records obtained from the 1369 West Fullerton Currency Exchange in Chicago indicate that the \$3,908 was received on or about April 2, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a

Connecticut driver's license, as "Vick Rasalingham." Based upon review of a copy of the driver's license maintained by the currency exchange and other information gathered during the investigation, I believe that ADRIAN IANC is the individual depicted on the driver's license and the individual who received Victim TV's funds.

131. **SCHNEIDER** - As previously discussed above in ¶¶ 91 and 92, on or about September 11, 2005, Victim JM received an email after negotiating on-line to purchase a 1998 Honda Prelude for \$4,500 that had been listed for sale on Yahoo! Victim JM subsequently transmitted \$4,500 via Western Union from a location in Long Beach, California, to the attention of Individual SB in Chicago, Illinois. GARY MICHAEL SCHNEIDER and Individual SB have advised law enforcement that Individual SB was recruited by FECHETE and SCHNEIDER to pick-up Western Union wire transfers from currency exchanges. Records obtained from Western Union indicate that the \$4,500 was received by Individual SB on or about September 14, 2005, at the New North Central Currency Exchange in Chicago by an individual who identified her/himself as Individual SB.

132. **VEGA** - As previously discussed above in ¶¶ 111 and 112, on or about June 23, 2005, Victim AS received an email purportedly from the eBay Motors "Passenger Vehicle Purchase Protection" program regarding an Audi automobile that Victim AS had agreed to purchase on-line. Victim AS subsequently transmitted \$4,000 via Western Union from a location in Ft. Lauderdale, Florida, to the attention of CW1 in Chicago, Illinois. As previously discussed above, CW1 and CW3 have advised law enforcement that CW1 was recruited by JESSIE VEGA to

pick-up Western Union wire transfers from currency exchanges. Records obtained from Western Union indicate that the \$4,000 was received by CW1 on or about June 24, 2005, at the State Ohio Currency Exchange in Chicago by an individual who identified her/himself as CW1.

133. **MOLOMAN** - On or about March 31, 2005, Victim RW received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a 20 foot trailer that Victim RW had previously bid upon. Victim RW subsequently transmitted \$3,500 via Western Union from a location in Galloway, New Jersey, to the attention of "Roland Simpson" in Chicago, Illinois. Records obtained from the Morse Avenue Currency Exchange in Chicago indicate that the \$3,500 was received on or about April 1, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a Texas driver license, as "Roland Simpson." Based upon review of a copy of the driver license maintained by the currency exchange and other information gathered during the investigation, I believe that IOAN MOLOMAN is the individual depicted on the driver license and the individual who received Victim RW's funds.

134. **ASLAN** - On or about April 5, 2005, Victim LS received an email purportedly from "Square Trade" relating to an eBay transaction in which Victim LS agreed to purchase a Yamaha ATV. Victim LS subsequently transmitted \$2,500 via Western Union from a location in Vernal, Utah, to the attention of "William Rogers" in Chicago, Illinois. Records obtained from the Cicero Armitage Currency Exchange in Chicago indicate that the \$2,500 was received on or about April 7,

2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported to be an Indiana driver's license, as "William Rogers." Based upon review of a copy of the driver's license maintained by the currency exchange and other information gathered during the investigation, I believe that IGOR ASLAN is the individual depicted on the driver's license and the individual who received Victim LS's funds.

135. **HANN** - On or about June 28, 2005, Victim JM received an email purportedly from eBay's "Security & Resolution Center" offering him the opportunity to buy a horse/stock trailer that Victim JM had previously bid upon. Victim JM subsequently transmitted \$3,420 via Western Union from a location in Washington, Missouri, to the attention of "Anthony Marconi" in Chicago, Illinois. Records obtained from the Grand and Harlem Currency Exchange in Chicago indicate that the \$3,420 was received on or about June 29, 2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported to be an Ontario driver's license, as "Anthony Marconi." Based upon review of a copy of the driver's license maintained by the currency exchange and other information gathered during the investigation, I believe that MIHAIL EUGEN HANN is the individual depicted on the driver's license and the individual who received Victim JM's funds.

136. **ALEXANDRU** - On or about March 9, 2004, Victim PW received an email providing instructions on how to transmit payment to purchase 4 tickets to the men's ACC basketball tournament that Victim PW had seen advertised for sale

on eBay for \$800. Records obtained from Victim PW and Western Union indicate that on or about March 9, 2004, Victim PW caused \$800 to be transmitted from a location in Bridgeton, Missouri, to the attention of "Kaltz Goldman." Records obtained from Western Union indicate that the funds transmitted by Victim PW were received on or about March 10, 2004, at the Kedzie & Elston Currency Exchange in Chicago, Illinois, by an individual who identified himself as "Kaltz Goldman" with a Ohio identification card bearing no. C46228964. On March 10, 2004, "Kaltz Goldman" was arrested by the CPD at another currency exchange, the Lincoln Foster Currency Exchange in Chicago, after he attempted to receive funds transmitted by another individual to Western Union. At the time of his arrest, "Kaltz Goldman" was in possession of a Ohio identification card bearing no. C4628964. I have reviewed a copy of the identification card seized by the CPD on March 10, 2004, and based upon that review and other information gathered during the investigation, I believe that MIRLAN ALEXANDRU is the individual depicted on the Ohio identification card as "Kaltz Goldman" and the individual who received Victim PW's funds on March 10, 2004, at the Kedzie & Elston Currency Exchange.

137. **GANESCU** - On or about October 3, 2005, Victim HL received an email which provided him with instructions on how to transmit payment to purchase Swarovski Lovebirds that Victim HL had seen advertised on eBay. Victim HL subsequently transmitted \$1,650 via Western Union from a location in Santa Clara, California, to the attention of "Martin Lake" in Chicago, Illinois. Records obtained from the Bensenville Currency Exchange in Bensenville, Illinois, indicate that the

\$1,650 was received on or about October 4, 2004, by an individual who identified himself in the application to receive funds, and through presentation of an Arizona driver license as "Martin Lake." Based upon review of a copy of the identification card maintained by the currency exchange and other information gathered during the investigation, I believe that BOGDAN GANESCU is the individual depicted on the identification card and the individual who received Victim HL's funds.

138. **SIMON** - On or about August 7, 2005, Victim MA received an email purportedly from the "eBay Security Center" offering her the opportunity to buy a 23' GMC motorhome that Victim MA had previously bid upon. Victim MA subsequently transmitted \$1,504 via Western Union from a location in Madison, Alabama, to the attention of "Claudia Albin." Records obtained from Western Union indicate that the \$1,504 was received on or about August 8, 2005, at a Western Union agent located in Bensenville, Illinois, by an individual who identified herself as "Claudia Albin" with a Florida identification card bearing no. A973399753570. Three days later, on August 11, 2005, GIANINA SIMON was arrested by the Franklin Park Police Department after she attempted to receive funds transmitted by Western Union at the Franklin Park Currency Exchange which had been sent by another victim of the scheme, Victim MG, to "Claudia Albin." At the time of her arrest, SIMON was in possession of a Florida identification card bearing no. A973399753570. Based upon review of a copy of the identification card seized by the Franklin Park Police on August 11, 2005, and other information gathered during the investigation, I believe that GIANINA SIMON is

the individual depicted on the Florida identification card and the individual who received Victim MA's funds on August 8, 2005, in Bensenville, Illinois.

139. **RIZESCU** - On or about April 8, 2004, Victim RM received an email advising him of a second chance offer to purchase a Ricoh Digital Copier Printer Scanner. Victim JS subsequently transmitted \$2,000 via Western Union from a location in Albuquerque, New Mexico, to the attention of "Antonio Muscani" in Chicago, Illinois. Records obtained from Western Union indicate that the \$2,000 was received on or about April 8, 2004, at the New Oakton and Route 83 Currency Exchange in Des Plaines, Illinois, by an individual who identified himself in the application to receive funds, and through presentation of a Nevada driver license (no. 7538195432), as "Antonio Muscani." I have reviewed a copy of Nevada driver license, no. 7538195432, made by an employee of the New Irving Austin Currency Exchange in Chicago on or about April 19, 2004, presented by "Antonio Muscani" when he received a Western Union wire transfer of funds from another individual. Based upon review of the copy of the operator license maintained by the New Irving Austin Currency Exchange and other information gathered during the investigation, I believe that RADU RIZESCU is the individual depicted on the Nevada driver license and the individual who received Victim RM's funds at the New Oakton and Route 83 Currency Exchange on April 8, 2004.

140. **LADISLAU** - On or about August 11, 2005, Victim SG received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a Nissan 300zx that Victim SG had previously bid upon. Victim SG

subsequently transmitted \$1,940 via Western Union from a location in Springfield, Missouri, to the attention of "Arpad Kallo" in Chicago, Illinois. Records obtained from the Grand and Hamlin Currency Exchange in Chicago indicate that the \$1,940 was received on or about August 12, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a Florida identification card, as "Arpad Kallo." Based upon review of a copy of the identification card maintained by the currency exchange and other information gathered during the investigation, I believe that MUSZKA LADISLAU is the individual depicted on the identification card and the individual who received Victim SG's funds.

141. BENTAN - On or about September 30, 2005, Victim DD received an email purportedly from eBay's "Square Trade" program relating to the purchase of an Acura Integra. Victim DD subsequently transmitted \$2,950 via Western Union from a location in Richmond, Virginia, to the attention of "Paul Bigotti" in Chicago, Illinois. Records obtained from the TCF Bank and Evanston Police Department indicate that the \$2,950 was received on or about October 1, 2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported to be an Indiana operator driver license, no. 0410-99-3877, as "Paul Bigotti." Based upon review of a copy of an Indiana operator driver license, no. 0410-99-3877, purportedly depicting "Paul Bigotti" which was obtained by law enforcement from another currency exchange and other information gathered during the investigation, I believe that CRISTIAN BENTAN is the individual

depicted on the driver's license and the individual who received Victim DD's funds.

142. **LUCAN** - On or about February 18, 2005, Victim GR received an email purportedly from eBay's "Security & Resolution Center" offering him the opportunity to buy a haybine that Victim GR had previously bid upon. Victim GR subsequently transmitted \$2,930 via Western Union from a location in Marysville, Ohio, to the attention of "Massimo Proetti" in Chicago, Illinois. Records obtained from the Armitage Kedzie Currency Exchange in Chicago indicate that the \$2,930 was received on or about February 21, 2005, by an individual who identified himself in the application to receive funds, and through presentation of what purported to be a Vermont driver's license, as "Massimo Proetti." Based upon review of a copy of the driver's license maintained by the currency exchange and other information gathered during the investigation, I believe that CONSTANTIN REMUS LUCAN is the individual depicted on the driver's license and the individual who received Victim GR's funds.

143. **PANAITESCU** - On or about April 4, 2005, Victim JS received an email providing a "Second Chance Offer" to buy a Harley Davidson advertised on eBay that Victim JS had previously bid upon. Victim JS subsequently transmitted \$2,601 via Western Union from a location in Foreman, Arkansas, to the attention of "Dany Makow" in Chicago, Illinois. Records obtained from Western Union indicate that the \$2,601 was received on or about April 6, 2005, at the Foster Currency Exchange in Chicago, Illinois, by an individual who identified himself in the application to receive funds, and through presentation of a Michigan operator

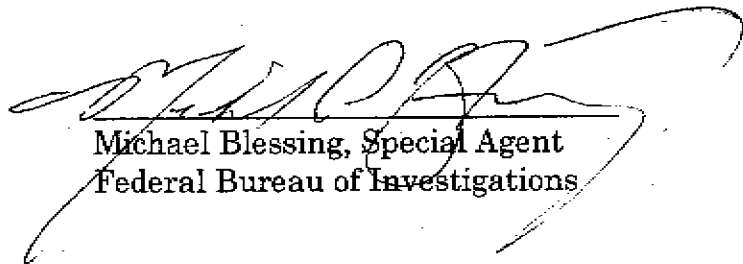
license (no. M265174316403), as "Dany Makow." I have reviewed a copy of Michigan operator license, no. M265174316403, made by an employee of the Morse Avenue Currency Exchange in Chicago on or about April 7, 2005, presented by "Dany Makow" when he received a Western Union wire transfer of funds from another individual. Based upon review of the copy of the operator license maintained by the Morse Avenue currency exchange and other information gathered during the investigation, I believe that MIHAI PANAITESCU is the individual depicted on that Michigan operator license and the individual who received Victim JS's funds at the Foster Currency Exchange on April 6, 2005.

144. **DUMITRU** - On or about April 7, 2005, Victim MF received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a 28 foot boat that Victim MF had previously bid upon. Victim MF subsequently transmitted \$5,568 via Western Union from a location in East Wareham, Massachusetts, to the attention of "Criss Becli" in Chicago, Illinois. Records obtained from the Morse Avenue Currency Exchange in Chicago indicate that the \$5,568 was received on or about April 8, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a Michigan operator license, as "Criss Becli." Based upon review of a copy of the operator license maintained by the currency exchange and other information gathered during the investigation, I believe that STEFAN LAURENTIU DUMITRU is the individual depicted on the operator license and the individual who received Victim MF's funds.

145. **NANAU** - On or about August 3, 2005, Victim MA received an email purportedly from the "eBay Security Center" offering him the opportunity to buy a Cape Cod timeshare that Victim MA had previously bid upon. Victim MA subsequently transmitted \$1,450 via Western Union from a location in Santa Barbara, California, to the attention of "Joe Myers" in Chicago, Illinois. Records obtained from the Grand and Hamlin Currency Exchange in Chicago indicate that the \$1,450 was received on or about August 6, 2005, by an individual who identified himself in the application to receive funds, and through presentation of a North Carolina driver license, as "Joe Myers." Based upon review of a copy of the driver license maintained by the currency exchange and other information gathered during the investigation, I believe that LUCIAN NANAU is the individual depicted on the operator license and the individual who received Victim MA's funds.

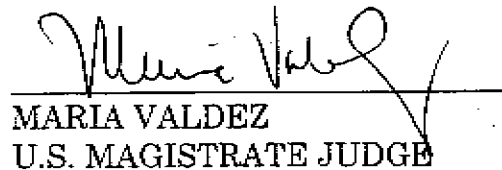
VIII. CONCLUSION

146. Based upon the foregoing paragraphs, I believe that there is probable cause to believe that each of the named Subjects of this Criminal Complaint knowingly and intentionally devised and participated in a scheme to defraud that was executed by wire in violation of Title 18, United States Code, Section 1343.



Michael Blessing, Special Agent
Federal Bureau of Investigations

SUBSCRIBED AND SWORN TO BEFORE ME
this 11th day of December, 2006.



MARIA VALDEZ
U.S. MAGISTRATE JUDGE